De	eposition	Defe	enant Kevin Fow	vler's Initial D	esignations		Plaintiff Anthony Rapp's Objections	Plai	ntiff Anthony Ra	pp's Initial D	esignations	Def	enant Kevin Fowler's Objections to Counter-Designations
WITNESS	Date	PINCITE	Page Start	Line Start	Page End	Line End	OBJECTION	PINCITE	Page Start	Line Start	Page End	Line End	OBJECTION
John Barrowman	5/26/2021	5:18-6:2	5	18	6	2		6:5-11	6	5	6		ince (FRE 401); counsel's statements t evidence; confuses the issues (FRE
John Barrowman	5/26/2021	6:12-17	6	12	6	17		10:10-12	10	10	10	12	
John Barrowman	5/26/2021	7:3-13	7	3	7	13		19:17-20:3	19	17	20		nce (FRE 401); confuses the issues ndue consumption of time (FRE 403)
John Barrowman	5/26/2021	7:24-8:23	7	24	8	23		20:6-14	20	6	20	14	
John Barrowman	5/26/2021	10:13-25	1	13	10	25		21:13-18	21	13	21	18	
John Barrowman	5/26/2021	11:5-25	11	5	11	25		21:24-22:11	21	24	22	11	
John Barrowman	5/26/2021	12:24-14:16	12	24	14	16		23:21-24:9	23	21	24	9 Nonre	sponsive
John Barrowman	5/26/2021	14:21-18:8	14	21	18	8		26:4-6	24	4	24	6	
John Barrowman	5/26/2021	18:15-19:16	18	15	19	16		28:11-13	28	11	28	13	
John Barrowman	5/26/2021	20:4-5	20	4	20	5		28:22-29-3	28	22	29	3	
John Barrowman	5/26/2021	20:15-21:12	20	15	21	12		29:20-22	29	20	29	22	
John Barrowman	5/26/2021	21:19-23	21	19	21	23		31:23-32-10	31	23	32	10	
John Barrowman	5/26/2021	22:12-23:20	22	12	23	20		33:2-8	33	2	33	8	
John Barrowman	5/26/2021	24:10-19	24	10	24	19		33:21-34:22	33	21	34	and u	nnce (FRE 401); confuses the issues indue consumption of time (FRE 403); ay (FRE 801, 802)
John Barrowman	5/26/2021	25:1-26:3	25	1	26	3		40:23-41:5	40	23	41	regard	personal knowledge/speculation ling what "everyone" believes or led (FRE 602)
John Barrowman	5/26/2021	27:3-28:10	27	3	28		Objection is made to page 27:4-6 as to everything after the word "No." as guessing and speculation	46:7-8	46	7	46	8	
John Barrowman	5/26/2021	28:14-21	28	14	28	21		46:12-48:15	46	12	48	Mr. Fo 401); undue	per designation/nonresponsive to owler's desigantions; relevance (FRE confuses the issues, misleads the jury, consumption of time, cummulative 03); hearsay (FRE 801, 802)
John Barrowman	5/26/2021	29:4-8	29	4	29	8		49:7-11	49	7	49	Mr. Fo 401); undue	per designation/nonresponsive to owler's desigantions; relevance (FRE confuses the issues, misleads the jury, consumption of time, cummulative 03); hearsay (FRE 801, 802)
John Barrowman	5/26/2021	29:13-19	29	13	29	19		49:22-50:6	49	22	50	Mr. Fo 401); undue	per designation/nonresponsive to owler's desigantions; relevance (FRE confuses the issues, misleads the jury, consumption of time, cummulative 03); hearsay (FRE 801, 802)

John Barrowman	5/26/2021	29:23-30:6	29	23	30	6		58:5-10	58	5	58	10 Improper designation/nonresponsive to Mr. Fowler's desigantions; relevance (FRE 401); confuses the issues, misleads the jury, undue consumption of time, cummulative (FRE 403); hearsay (FRE 801, 802)
	- ((
John Barrowman	5/26/2021	30:14-31:22	30	14	31	22		60:21-24	60	21	60	24
John Barrowman	5/26/2021	35:5-40:22	35	5	40	22		62:10-63:12	62	10	63	12
John Barrowman	5/26/2021	41:6-42:21	41	6	42	21		63:20-65:5	63	20	65	5 Improper designation/nonresponsive to Mr. Fowler's designations; relevance (FRE 401); confuses the issues, misleads the jury, undue consumption of time, cummulative, undue consumption of time (FRE 403); hearsay (FRE 801, 802); lack of personal knowledge/speculation regarding Mr. Fowler's state of mind (FRE 602)
John Barrowman	5/26/2021	43:12-44:22	43	12	44	22	3-14 Heresay	68:7-12	68	7	68	12
John Barrowman	5/26/2021	45:12-22	45	12	45	22	211161634	68:16-69-4	68	16	69	4
John Barrowman	5/26/2021	46:1-6	46	1	46	6		70:4-5	70	4	70	5 Mr. Barrowman's opinion regarding what is appropriate is irrelevant (FRE 401); misleading the jury, confusing the issues (FRE 403)
John Barrowman	5/26/2021	46:9-11	46	9	46	11		70:12-15	70	12	70	15
John Barrowman	5/26/2021	55:22-56:3	55	22	56	3		71:19-20	71	19	71	20 Vague and ambiguous; Calls for speculation/lack of personal knowledge (FRE 602); Hearsay (FRE 801, 802)
John Barrowman	5/26/2021	56:6-7	56	6	56	7		71:22-23	71	22	71	23 Improper designation/nonresponsive to Mr. Fowler's designation; Assumes facts; argumentative; lacks personal knowledge/speculation regarding Mr. Rapp's allegations (FRE 602); hearsay (FRE 801, 802)
John Barrowman	5/26/2021	56:9-15	56	9	56	15		71:25-72:1	71	25	72	1
John Barrowman	5/26/2021	56:18-57:5	56	18	57	6		72:4-72:15	72	4	72	15
John Barrowman	5/26/2021	57:13-58:4	57	13	58	4		73:18-20	73	18	73	20 Improper designation/nonresponsive to Mr. Fowler's designation; Assumes facts; argumentative; lacks personal knowledge/speculation regarding Mr. Rapp's allegations (FRE 602); hearsay (FRE 801, 802); Ccummulative, undue consumption of time (FRE 403)
John Barrowman	5/26/2021	58:11-13	58	11	58	13		73:23-24	73	23	73	24 Improper designation/nonresponsive to Mr. Fowler's designation; Assumes facts; argumentative; lacks personal knowledge/speculation regarding Mr. Rapp's allegations (FRE 602); hearsay (FRE 801, 802); cummulative, undue consumption of time (FRE 403)

John Barrowman	5/27/2021	58:17-59:1	58	17	59	1	74:2-5	74	2	74	5 Improper designation/nonresponsive to Mr. Fowler's designation; Assumes facts; argumentative; lacks personal knowledge/speculation regarding Mr. Rapp's allegations (FRE 602); hearsay (FRE 801, 802)
John Barrowman	5/26/2021	59:10-60:14	59	10	60	14	74:9-11	74	9	74	IIImproper designation/nonresponsive to Mr. Fowler's designation; cummulative, unfairly prejudicail, undue consumptio of time (FRE 403); hearsay (FRE 801, 802)
John Barrowman	5/26/2021	60:16-17	60	16	60	17	74:13-15	74	13	74	Inproper designation/nonresponsive to Mr. Fowler's designation; cummulative, unfairly prejudicail, undue consumptio of time (FRE 403); hearsay (FRE 801, 802)
John Barrowman	5/26/2021	69:6-70:3	69	6	70	3	74:17-19	74	17	74	19 Improper designation/nonresponsive to Mr. Fowler's designation; unfairly prejudicial, cummulative, undue consumption of time (FRE 403); hearsay (FRE 801, 802)
John Barrowman	5/26/2021	70:16-71:1	70	16	71	1	74:21-75:6	74	21	75	6 75:4-6: speculation/lacks personal knowledge (FRE 602); hearsay (FRE 801, 802); undue consumption of time, confuses the issues (FRE 403)
John Barrowman	5/26/2021	71:3-10	71	3	71	10	75:11-25	75	11	75	25 Speculation/lacks personal knowledge (FRE 602); hearsay (FRE 801, 802); relevance (FRE 401)
John Barrowman	5/26/2021	71:14-17	71	14	71	17	76:15-24	76	15	76	Improper designation/nonresponsive to Mr. Fowler's designation; hearsay (FRE 801, 802); cummulative, undue consumption of time (FRE 403); 76:21-24: lacks personal 24 knowledge speculation (FRE 602)
John Barrowman	5/26/2021	73:15-17	73	15	73	17	77:3-10	77	3	77	Speculation/lacks personal knowledge (FRE 10 602)
John Barrowman	5/26/2021	85:5-11	85	5	85	11	77:12-13	77	12	77	Confuses the issues, misleads the jury, 13 unfairly prejudicial (FRE 403)
John Barrowman	5/26/2021	85:22-86:12	85	22	86	12	77:16-77:16	77	16	77	Confuses the issues, misleads the jury, 16 unfairly prejudicial (FRE 403)
John Barrowman	5/26/2021	87:4-7	87	4	87	7	77:21-77:21	77	21	77	Confuses the issues, misleads the jury, 21 unfairly prejudicial (FRE 403)
John Barrowman	5/26/2021						80:22-80:25	80	22	80	25
John Barrowman	5/26/2021						81:4-81:13	81	4	81	13
John Barrowman	5/26/2021						81:15-81:21	81	15	81	Lacks personal knowledge/speculation regarding what Mr. Fowler believed or 21 intended (FRE 602)
i e					1		01.15 01.21	82		82	/

John Barrowman	5/26/2021								Improper designation/nonresponsive to
									Mr. Fowler's designations; hearsay (FRE
				86:25-87:3	86	25	87	3	801, 802)

Case 1:20-cv-09586-LAK Document 156-2 Filed 03/04/22 Page 5 of 46

Deposi	tion	De	fenant Kevin Fowler	r's Initial Des	ignations		Plaintiff Anthony Rapp's Objections	Plaint	tiff Anthony Rapp'	s Counter-Des	ignations		Defenant Kevin Fowler's Objections to Counter-Designations
WITNESS	Date	PINCITE	Page Start	Line Start	Page End	Line End	OBJECTION	PINCITE	Page Start	Line Start	Page End	Line End	OBJECTION
Michael Collins, PhD	4/27/2021	5:10-17	5	10	5	17		6:20-23	6	20	6	23	
Michael Collins, PhD	4/27/2021	5:20-6:5	5	2	6	5		10:5-13	10	5	5	13	
Michael Collins, PhD	4/27/2021	6:10-19	6	10	6	19		16:17-20	16	17	16	20	
Michael Collins, PhD	4/27/2021	6:24-7:7	6	24	7	7		29:11-24	29	11	29	24	
Michael Collins, PhD	4/27/2021	8:18-10:4	8	18	10	4		30:3-31:6	30	3	31	6	
Michael Collins, PhD	4/27/2021	15:22-16:16	15	22	16	16		31:12-32:19	31	12	32	19	
Michael Collins, PhD	4/27/2021	16:25-29:10	16	25	29	10		33:6-34:6	33	6	34	6	
Michael Collins, PhD	4/27/2021	31:9-11	31	9	31	11		34:11-35:8	34	11	35	8	
Michael Collins, PhD	4/27/2021	32:20-33:5	32	20	33	5		39:23-40-12	39	23	40	12	
Michael Collins, PhD	4/27/2021	35:9-12	35	9	35	12		43:23-44:10	43	23	44	10	
Michael Collins, PhD	4/27/2021	37:19-38:8	37	19	38	8		44:17-46:2	44	17	46	2	
Michael Collins, PhD	4/27/2021	38:15-39:22	38	15	39	22		50:12-17	50	12	50	17	
												pat	evance of Dr. Collins' treatment other ients (FRE 401); confuses the issues, and
	. / /												due consumption of time (FRE 403)
Michael Collins, PhD	4/27/2021	41:4-43:22	41	4	43	22		50:20-52:11	50	20	52	pat	evance of Dr. Collins' treatment other ients (FRE 401); confuses the issues, and due consumption of time (FRE 403)
Michael Collins, PhD	4/27/2021	44:11-16	44	11	44	16		52:13-53:17	52	13	53	17	, ,
,	, ,											pat	evance of Dr. Collins' treatment other ients (FRE 401); confuses the issues, and due consumption of time (FRE 403)
Michael Collins, PhD	4/27/2021	46:4-16	46	4	46	16	Objection to page 46:11-13 as to relevance	53:21-23	53	21	53	23	
Michael Collins, PhD	4/27/2021	47:2-10	47	2	47	10		53:25-53:25	53	25	53	25	
Michael Collins, PhD	4/27/2021	47:12-49:18	47	12	49	18		54:2-54:12	54	2	54	12	
Michael Collins, PhD	4/27/2021	57:25-58:17	57	25	58	17		54:14-19	54	14	54	19	
Michael Collins, PhD	4/27/2021	58:22-61:17	58	22	61	17		57:9-13	57	9	57	13	
												Cor	mpound
Michael Collins, PhD	4/27/2021	62:4-19	62	4	62	19		57:16-18	57	16	57	18	
Michael Collins, PhD	4/27/2021							61:18-62:3	61	18	62	3	
Michael Collins, PhD	4/27/2021							63:6-21	63	6	63	and	evance (FRE 401); confuses the issues If misleads the jury (FRE 403); lack of sonal knowledge/speculation (FRE 602)
Michael Collins, PhD	4/27/2021							64:2-4	64	2	64	4 Spe (FR inco	eculaiton/lack of personal knowledge E 602); vague and ambiguous; omplete hypothetical
Michael Collins, PhD	4/27/2021							64:6-64:6	64	6	64	(FR inco	eculaiton/lack of personal knowledge E 602); vague and ambiguous; omplete hypothetical
Michael Collins, PhD	4/27/2021							64:9-14	64	9	64		eculaiton/lack of personal knowledge E 602)
Michael Collins, PhD	4/27/2021							64:16-64:16	64	16	64	16	

I	Deposition	Defen	nant Kevin Fowler'	s Initial Desig	nations	Pla	intiff Anthony Rapp's Objections	Plaint	iff Anthony Ra	pp's Counter-D	esignations		Defendant Kevin Fowler's Objections to Counter-Designations
Date	WITNESS	PINCITE	Page Start	Line Start	Page End	Line End	OBJECTION	PINCITE	Page Sta	art Line Start	Page End	Line End	Ţ
12/16/2021	Adam Vary	9:17-19	9	17	9	19		9:7-12	9	7	9	12	
12/16/2021	Adam Vary	12:5-7	12	5	12	7		9:25-10:1	9	25	10	1	
12/16/2021	Adam Vary	39:17-40:5	39	17	40	5 40:4-5	Privilege, relevance, probative value						
	,						ntially outweighed by a danger of						
						unfair	orejudice, confusing the issues,						
						mislead	ling the jury, wasting time, lacks						Relevance (FRE 401); undue consumption of
						founda	tion.	12:8-13:12	12	8	13	12	time (FRE 403)
12/16/2021	Adam Vary	40:11-12	40	11	40	12 40:11-1	2 Nonresponsive. The witness						
						refused	I to answer the question on the						
						advice	of counsel asserting privilege and						
						therefo	re the answer has no evidentiary						
						value.	•	13:15-13:15	13	15	13	15	
12/16/2021	Adam Vary	41:12-15	41	12	41	15 41:12-1	5 Relevance, probative value						
						substa	ntially outweighed by a danger of						
						confus	ng the issues, undue delay, wasting						
						time.		13:17-22	13	17	13	22	
12/16/2021	Adam Vary	41:23-42:6	41	23	42	6							
. ,	,					41:23-4	3:6 Privilege asserted by witness.						
							nce, probative value substantially						
							ghed by a danger of unfair prejudice,						
							ng the issues, misleading the jury,						Relevance (FRE 401); undue consumption of
						wastin		14:1-15:15	14	1	15		time (FRE 403)
12/16/2021	Adam Vary	42:11-12	42	11	42		2 Nonresponsive. The witness						(
12, 10, 2021	riaam vary	.2.22 22					I to answer the question on the						
							of counsel asserting privilege and						
							re the answer has no evidentiary						Relevance (FRE 401); undue consumption of
						value.	,	15:23-16-23	15	23	16		time (FRE 403)
12/16/2021	Adam Vary	48:9-16	48	9	48	16							(
12, 10, 2021	riaam vary	10.5 10					Privilege asserted by witness.						
							nce, probative value substantially						
							ghed by a danger of unfair prejudice,						
							ng the issues, misleading the jury,						Relevance (FRE 401); undue consumption of
						wastin		20:4-17	20	4	20		time (FRE 403)
12/16/2021	Adam Vary	48:22-23	48	22	48		23 Nonresponsive. The witness	20.1.27					((
12, 10, 2021	riaam vary	10.22 20					I to answer the question on the						
							of counsel asserting privilege and						
							re the answer has no evidentiary						
						value.	,	40:14-16	40	14	40	16	
12/16/2021	Adam Vary	48:25-49:3	48	25	49	3		59:1-7	59	1	59	7	
12/16/2021	Adam Vary	49:6-18	49	6	49	18		62:21-63:5	62	21	63	5	
12/16/2021	Adam Vary	49:21-50:3	49	21	50	3		64:8-10	64	8	64	10	
12/16/2021	Adam Vary	50:8	50	8	50	8		64:16-64:16	64	16	64	16	
12/16/2021	Adam Vary	50:10-12	50	10	50	12		71:12-15	71	12	71	15	
12/16/2021	Adam Vary	50:15-24	50	15	50	24				1	†		73:10-12: counsel's statements are not
,,	, , , ,			10				73:1-16	73	14	73	16	evidence
12/16/2021	Adam Vary	51:5-13	51	5	51	13		-	-	1			
,,		= = = = = = = = = = = = = = = = = = =			~- <u> </u>		B Privilege, relevance, probative value						
							ntially outweighed by a danger of	1					
							prejudice, confusing the issues,						
							ling the jury, wasting time.	74:18-24	74	18	74	24	

12/16/2021	Adam Vary	53:19-22	53	19	53	22	value substantially outweighed by a danger	76:9-13	76	9	76	13	
12/16/2021	Adam Vary	55:1-3	55	1	55	3	55:1-3 Privilege, relevance, probative value substantially outweighed by a danger of						
							unfair prejudice, confusing the issues, misleading the jury, wasting time.	76:15-18	76	15	76	18	
12/16/2021	Adam Vary	57:20-24	57	20	57	24							
							57:20-24 Privilege, relevance, probative						
							value substantially outweighed by a danger						
							of unfair prejudice, confusing the issues, misleading the jury, wasting time.	77:17-78-18	77	17	78	18	
12/16/2021	Adam Vary	58:17-25	58	17	58	25	misicading the jary, wasting time.	80:21-81:4	80	21	81	4	
12/16/2021	Adam Vary	59:13-16	59	13	59	16		83:10-15	83	10	83	15	
12/16/2021	Adam Vary	62:15-20	62	15	62	20		85:22-23	85	22	85	23	
12/16/2021	Adam Vary	65:16-20	65	16	65	20							
							65:16-20 Privilege asserted by witness.						
							Relevance, probative value substantially						
							outweighed by a danger of unfair prejudice,						
							confusing the issues, misleading the jury,						
42/46/2024	A dama Mana	CE 25 CC 4	65	25	66		undue delay, wasting time.	87:17-19	87	17	87	19	
12/16/2021	Adam Vary	65:25-66:1	65	25	66		65:25-66:1 Nonresponsive. The witness refused to answer the question on the						
							advice of counsel asserting privilege and						
							therefore the answer has no evidentiary						
							value.	91:2-5	91	2	91	5	
12/16/2021	Adam Vary	70:7-22	70	7	70	22	70:7-22 Relevance, probative value						
							substantially outweighed by a danger of						
							unfair prejudice, confusing the issues, undue						
							delay, wasting time.	91:7-10	91	7	91	10	
12/16/2021	Adam Vary	71:3-11	71	3	71		71:3-11 Relevance, probative value						
							substantially outweighed by a danger of						
							unfair prejudice, confusing the issues, undue delay, wasting time.	95:20-22	90	20	90	22	
12/16/2021	Adam Vary	71:16-20	71	16	71				95	24		25	
12/16/2021	Adam Vary	72:1-73:6	72	10	73		substantially outweighed by a danger of 72:1-73:6 Relevance, probative value	95:24-25	95	24	90	25	
12/10/2021	Auaiii vary	/2.1-/3.0	/2	1	/3		substantially outweighed by a danger of						
							unfair prejudice, confusing the issues, undue						
							delay, wasting time.	97:2-5	97	2	97	5	
12/16/2021	Adam Vary	73:17-74:17	73	17	74		73:17-74:17 Relevance, probative value						
							substantially outweighed by a danger of						
							unfair prejudice, confusing the issues, undue						
							delay, wasting time.	97:8-12	97	8	97	12	
12/16/2021	Adam Vary	74:25-75:17	74	25	75		74:25-75:17 Relevance, probative value						
							substantially outweighed by a danger of						
							unfair prejudice, confusing the issues, undue delay, wasting time.	97:21-25	97	21	97	25	
12/16/2021	Adam Vary	76:1-8	76	1	7		76:1-8 Relevance, probative value	57.21 25	5,		- 1,	23	
12, 10, 2021	, addin vary	, 0.1 0	, ,	1	[substantially outweighed by a danger of						
							unfair prejudice, confusing the issues, undue						
1							delay, wasting time.	99:21-100:5	99	21	100	5	

12/16/2021	Adam Vanz	76:22-77:11	76	22	77	1.	76:22-77:11 Relevance, probative value				1	1
12/16/2021	Adam Vary	76:22-77:11	76	22	//	1.	substantially outweighed by a danger of					
							, , , ,					
							unfair prejudice, confusing the issues, undue					
							delay, wasting time. 104:14-105:12	104	14	105	12	
12/16/2021	Adam Vary	89:12-90:7	89	12	90	-	89:12-90:7 Relevance, probative value					
							substantially outweighed by a danger of					
							unfair prejudice, confusing the issues, undue					
							delay, wasting time. 105:17-25	105	17	105	25	5
12/16/2021	Adam Vary	90:10-11	90	10	90	1:	90:10-90:11 Relevance, probative value					
							substantially outweighed by a danger of					
							unfair prejudice, confusing the issues, undue					
							delay, wasting time. 106:2-106:2	106	2	106	2	
12/16/2021	Adam Vary	92:20-21	92	20	92	2:	92:20-21 Relevance, probative value					
, , ,	, ,						substantially outweighed by a danger of					
							confusing the issues, undue delay, wasting					
							time. 114:25-115:2	114	25	115	-	,
12/16/2021	Adam Van	92:23-93:2	92	23	93		92:23-93:2 Relevance, probative value	114	23	113		
12/16/2021	Adam Vary	92.23-93.2	92	23	95	•						
							substantially outweighed by a danger of					
							confusing the issues, undue delay, wasting					
							time. 118:25-119:3	118	25	119	3	3
12/16/2021	Adam Vary	93:4	93	4	93	4	93:4-93:4 Relevance, probative value					
							substantially outweighed by a danger of					
							confusing the issues, undue delay, wasting					
							time. 126:2-3	126	2	126	3	8
12/16/2021	Adam Vary	93:6-7	93	6	93	-	93:6-93:7 Relevance, probative value					
	,						substantially outweighed by a danger of					
							confusing the issues, undue delay, wasting					
							time. 126:10-12	126	10	126	12	
12/16/2021	Adam Vary	93:15-16	93	15	93	16	93:15-93:16 Relevance, probative value	120		120		
12/10/2021	Addin vary	33.13 10	55	13	33		substantially outweighed by a danger of					Lack of personal knowledge/speculation
							confusing the issues, undue delay, wasting					(FRE 602); calls for expert testimony (FRE
								120	12	120	1.0	
10/10/10001		00.40	22					128	12	128	10	701, 702)
12/16/2021	Adam Vary	93:19	93	19	93	19	93:19-93:19 Relevance, probative value					
							substantially outweighed by a danger of					Lack of personal knowledge/speculation
							confusing the issues, undue delay, wasting					(FRE 602); calls for expert testimony (FRE
							time. 128:19-21	128	19	128	21	701, 702)
12/16/2021	Adam Vary	93:21-25	93	21	93	25	93:21-93:25 Relevance, probative value					
							substantially outweighed by a danger of					
							confusing the issues, undue delay, wasting					
							time. 130:5-6	130	5	130	6	5
12/16/2021	Adam Vary	94:5-14	94	5	94	14	94:5-94:14 Relevance, probative value					
	,						substantially outweighed by a danger of					
							confusing the issues, undue delay, wasting					
							time. 130:13-130:13	130	13	130	13	
12/16/2021	Adam Vary	94:19-21	94	19	94	2.	96:13-96:19 Relevance, probative value	150	13	130	1,	,
12/10/2021	Audili valy	94.19-21	34	19	34	۷.	· ·					
							substantially outweighed by a danger of					
							confusing the issues, undue delay, wasting	400	4.5	400		
							time. 130:15-17	130	15	130	17	
12/16/2021	Adam Vary	95:6-8	95	6	95	8	95:6-95:8 Relevance, probative value					
1							substantially outweighed by a danger of					
							unfair prejudice, confusing the issues, undue					
							delay, wasting time. 131:3-131:3	131	3	131	3	3

42/46/2024	A -l 1 /	05.40.44	05	40	0.5	4405-40 05-44 Delawara mekatika yaka
12/16/2021	Adam Vary	95:10-14	95	10	95	14 95:10-95:14 Relevance, probative value
						substantially outweighed by a danger of
						unfair prejudice, confusing the issues, undue
42/46/2024	A -l > / ·	05.46.40	25	4.6	0.5	delay, wasting time. 132:25-133:3 132 25 133 3
12/16/2021	Adam Vary	95:16-18	95	16	95	18 95:16-95:18 Relevance, probative value
						substantially outweighed by a danger of
						unfair prejudice, confusing the issues, undue
12/15/2021		05.0.11	25		96	delay, wasting time. 133:5-11 133 5 113 11
12/16/2021	Adam Vary	96:9-11	96	9	96	11 96:9-96:11 Relevance, probative value
						substantially outweighed by a danger of
						unfair prejudice, confusing the issues, undue
12/15/2021	A d > 1 (06.42.40	96	13	96	delay, wasting time. 133:19-23 133 19 133 23
12/16/2021	Adam Vary	96:13-19	96	13	96	19 96:13-19 Relevance, probative value
						substantially outweighed by a danger of
						unfair prejudice, confusing the issues, undue delay, wasting time. 134:2-9 134 2 134 9
12/16/2021	A da \ / a	97:14-20	97	14	97	<i>n</i>
12/16/2021	Adam Vary	97:14-20	97	14	97	20 97:14-20 Relevance, probative value
						substantially outweighed by a danger of
						confusing the issues, undue delay, wasting
12/15/2021	A d > 1 (00.4.43	98	4	98	time. 136:15-19 136 15 136 19 12 98:4-12 Relevance, probative value 12 12 12 12
12/16/2021	Adam Vary	98:1-12	98	1	98	
						substantially outweighed by a danger of
						confusing the issues, undue delay, wasting
12/15/2021	A 1 1/	20.21.20.6	22	24	00	time. 138:19-22 138 19 138 22 6 substantially outweighed by a danger of 150:11-14 150 11 150 14
12/16/2021	Adam Vary	98:21-99:6	98 99	21 13	99	, , ,
12/16/2021	Adam Vary	99:13-20		13	99	20 substantially outweighed by a danger of 150:17-22 150 17 150 22
12/16/2021	Adam Vary	100:6-16	100	6	100	16 100:6-16 Relevance, probative value
						substantially outweighed by a danger of
						confusing the issues, undue delay, wasting
12/15/2021	A 1 1/	100.05.101.6	100	25	101	time. 150:24-151:2 150 24 151 2
12/16/2021	Adam Vary	100:25-101:6	100	25	101	6 100:25-101:6 Relevance, probative value
						substantially outweighed by a danger of
						confusing the issues, undue delay, wasting
42/46/2024	A -l > / ·	105.12.16	105	43	405	time. 151:6-15 151 6 151 15 Nonresponsive 16 105:13-16 Relevance, probative value Image: Control of the probability of
12/16/2021	Adam Vary	105:13-16	105	13	105	
						substantially outweighed by a danger of
						confusing the issues, undue delay, wasting time. 161:12-15 161 12 161 15
12/15/2021	A d > 1 (113:16-22	112	16	442	time. 161:12-15 161 12 161 15 22 113:20-22 Relevance, probative value 161 12 161 15
12/16/2021	Adam Vary	113:16-22	113	16	113	
						substantially outweighed by a danger of
						confusing the issues, undue delay, wasting time. 161:21-162:8 161 21 162 8 Nonresponsive
12/16/2021	A dama Mara	113:24-114:5	113	24	114	time. 161:21-162:8 161 21 162 8 Nonresponsive 5 113:24-114:5 Relevance, probative value Image: Relevance of the control of the con
12/16/2021	Adam Vary	113:24-114:5	113	24	114	
						substantially outweighed by a danger of confusing the issues, undue delay, wasting
12/16/2021	Adam Vary	114:20-24	114	20	114	time. 163:14-19 163 14 163 19 24 114:20-114:24 Relevance, probative value 166:5: Move to strike after "did I" as
12/10/2021	Audili Valy	114.20-24	114	20	114	substantially outweighed by a danger of substantially outweighed by a danger of nonresponsive; speculation (FRE 602);
						confusing the issues, undue delay, wasting improper opinion testimony regarding
						time. 165:23-166-12 165 23 166 12 "common practices"
			1 1			lanc. 103.23-100-12 103 23 100 12 Common practices

12/16/2021	Adam Vary	117:11-118:24	117	11	118	24 117:11-118:24 Relevance, probative value						
, ., .	,					substantially outweighed by a danger of						
						confusing the issues, undue delay, wasting						
						time.	168:10-13	168	10	168	1	3
12/16/2021	Adam Vary	119:4-5	119	4	119	5						
	·					119:4-119:5 Privilege asserted by witness.						
						Relevance, probative value substantially						
						outweighed by a danger of unfair prejudice,						
						confusing the issues, misleading the jury,						
						undue delay, wasting time.	168:19-23	168	19	168	2	3
12/16/2021	Adam Vary	119:12-13	119	12	119	13 119:12-13 Nonresponsive. The witness						
						refused to answer the question on the						
						advice of counsel asserting privilege and						
						therefore the answer has no evidentiary						
						value.	170:12-17	170	12	170	1	7
12/16/2021	Adam Vary	119:15-120:12	119	15	120	12 119:15-120:12 Relevance, probative value						
						substantially outweighed by a danger of						
						confusing the issues, undue delay, wasting						
						time.	172:18-24	172	18	172	2	Invades fact-finding province of jury
12/16/2021	Adam Vary	120:22-121:1	120	22	121	1						
						120:22-120:24 Relevance, probative value						
						substantially outweighed by a danger of						
						confusing the issues, undue delay, wasting						
						time; 120:25-121:1 Privilege asserted by						
						witness. Relevance, probative value						
						substantially outweighed by a danger of						
						unfair prejudice, confusing the issues,						
						misleading the jury, undue delay, wasting						
						time.	231:22-232:1	231	22	232		1
12/16/2021	Adam Vary	121:8-12	121	8	121	12						
						121:8-121:9 Nonresponsive. The witness						
						refused to answer the question on the						
						advice of counsel asserting privilege and						
						therefore the answer has no evidentiary						
						value.; 121:10-121:12 Relevance, probative						
						value substantially outweighed by a danger						
						of confusing the issues, undue delay,						
						wasting time.	232:5-233:7	232	5	233		7
12/16/2021	Adam Vary	121:15-25	121	15	121	25 121:15-121:25 Relevance, probative value						
						substantially outweighed by a danger of						
						confusing the issues, undue delay, wasting						
							250:24-251:1	250	24	251		1
12/16/2021	Adam Vary	122:6-10	122	6	122	10	1					
						122:6-8 Relevance, probative value	1					
						substantially outweighed by a danger of	1					
						confusing the issues, undue delay, wasting	1					
						time, cumulative evidence. 122:9-10	1					
						Privilege asserted by witness. Relevance,					1	
						probative value substantially outweighed by	1					
						a danger of unfair prejudice, confusing the	1					
						issues, misleading the jury, undue delay,	1					
						wasting time, argumentative.	254:8-12	254	8	254	1	2

12/16/2021	Adam Vanz	122:16-21	122	16	122	21	1					1	
12/16/2021	Adam Vary	122:16-21	122	16	122	21	122:16-17 Nonresponsive. The witness						
							refused to answer the question on the						
							advice of counsel asserting privilege and						
							therefore the answer has no evidentiary						
							·						
							value. 122:18-21 Privilege asserted by						
							witness. Relevance, probative value						
							substantially outweighed by a danger of						
							unfair prejudice, confusing the issues,						
							misleading the jury, undue delay, wasting	254.45.254.45	25.4	4.5	25.4	45	
12/16/2021	A dama Maria	122.4.44	422	-	422	- 11	time, argumentative.	254:15-254:15	254	15	254	15	
12/16/2021	Adam Vary	123:4-11	123	4	123	11							
							123:4-5 Nonresponsive. The witness refused						
							to answer the question on the advice of						
							counsel asserting privilege and therefore the						
							answer has no evidentiary value; 122:6-11						
							Relevance, probative value substantially						
							outweighed by a danger of confusing the						
								254:17-18	254	17	254	18	
12/16/2021	Adam Vary	123:12-14	123	12	123	14							
							123:12-14 Privilege asserted by witness.						
							Relevance, probative value substantially						
							outweighed by a danger of unfair prejudice,						
							confusing the issues, misleading the jury,						
							undue delay, wasting time, argumentative,						
							improper characterization, lack of						
							foundation.	254:21-255:9	254	21	255	9	
12/16/2021	Adam Vary	124:8-9	124	8	124	S]						
							124:8-9 Nonresponsive. The witness refused						
							to answer the question on the advice of						
							counsel asserting privilege and therefore the						
							answer has no evidentiary value.	255:14-15	255	14	255	15	
12/16/2021	Adam Vary	124:11-13	124	11	124	13							
							124:11-13 Privilege asserted by witness.						
							Relevance, probative value substantially						
							outweighed by a danger of unfair prejudice,						
							confusing the issues, misleading the jury,						
							undue delay, wasting time, argumentative,						Impermissible expert testimony regarding
							improper characterization, lack of						Mr. Vary's "observation[s] across the
							foundation.	255:20-25	255	20	255	25	profession." (FRE 701, 702)
12/16/2021	Adam Vary	124:20-25	124	20	124	25	124:20-21 Nonresponsive. The witness						
							refused to answer the question on the						
							advice of counsel asserting privilege and						
							therefore the answer has no evidentiary						
							value.	256:17-23	256	17	256	23	
12/16/2021	Adam Vary	125:9-12	125	9	125	12		257:1-4	257	1	257	4	
12/16/2021	Adam Vary	125:17-126:1	125	17	126	1		257:15-16	257	15	257	16	
12/16/2021	Adam Vary	126:14-23	126	14	126	23	126:20-23 Relevance, probative value						
							substantially outweighed by a danger of						Impermissible expert testimony regarding
							confusing the issues, undue delay, wasting						Mr. Vary's observations across the
							time, cumulative evidence.	257:18-21	257	18	257	21	profession (FRE 701, 702)

12/16/2021	Adam Van	127:7-11	127	7	127	11 127:7-11 Relevance, probative value				T	1	
12/16/2021	Adam Vary	127:7-11	127	/	127	substantially outweighed by a danger of						Impermissible expert testimony regarding
						, , , ,						
						confusing the issues, undue delay, wasting	257:23-258:6	257	23	250		Mr. Vary's observations across the
12/16/2021	A -1 > 1	127:13-17	127	13	127	time, cumulative evidence. 17 127:13-17 Relevance, probative value	257:23-258:0	257	23	258	Ь	profession (FRE 701, 702)
12/16/2021	Adam Vary	127:13-17	127	13	127	* *						
						substantially outweighed by a danger of						
						confusing the issues, undue delay, wasting	250.42.25	250	4.2	250	25	
10/16/2021		400.00.04	400	22	100		258:12-25	258	12	258	25	
12/16/2021	Adam Vary	128:23-24	128	23	128	24						
						128:23-24 Privilege asserted by witness.						
						Relevance, probative value substantially						
						outweighed by a danger of unfair prejudice,						
						confusing the issues, misleading the jury,						
						undue delay, wasting time.	259:23-25	259	23	259	25	
12/16/2021	Adam Vary	129:5-6	129	5	129	6						
						129:5-6 Nonresponsive. The witness refused						
						to answer the question on the advice of						
						counsel asserting privilege and therefore the						
						answer has no evidentiary value.	260:6-9	260	6	260	9	
12/16/2021	Adam Vary	131:5-7	131	5	131	7 131:5-131:7 Relevance, probative value						
						substantially outweighed by a danger of						
						confusing the issues, undue delay, wasting						
						time.	260:11-22	260	11	260	22	
12/16/2021	Adam Vary	131:14-23	131	14	131	23 131:14-131:23 Relevance, probative value						
						substantially outweighed by a danger of						
						confusing the issues, undue delay, wasting						
						time.	260:25-261:6	260	25	261	6	261:4-6 asked and answered; cummulative
12/16/2021	Adam Vary	135:2-5	135	2	135	5 135:2-5 Relevance, probative value						
						substantially outweighed by a danger of						
						confusing the issues, undue delay, wasting						
							261:8-10	261	8	261	10	Asked and answered; cummulative
12/16/2021	Adam Vary	135:22-25	135	22	135	25 135:22-25 Relevance, probative value						,
' ' '	' ' '					substantially outweighed by a danger of						
						confusing the issues, undue delay, wasting						
							261:12-262:3	261	12	262	3	262: 1-3 Asked and answered; cummulative
12/16/2021	Adam Vary	136:1-3	136	1	136	3 136:1-3 Relevance, probative value	201.12 202.0	201				2021 2 0 7 ished dira diishered, daiiinidaare
12/10/2021	riddin vary	130.1 3	150		130	substantially outweighed by a danger of						
						confusing the issues, undue delay, wasting						
							262:6-10	262	6	262	10	Asked and answered; cummulative
12/16/2021	Adam Vary	136:6-14	136	6	136	14 136:6-14 Relevance, probative value	202.0 10	202	-	202	10	Asked and answered, cummulative
12/10/2021	Audili vary	130.0-14	130	٥	130	substantially outweighed by a danger of						
						confusing the issues, undue delay, wasting						
							264:10-16	264	10	264	16	
12/16/2021	A do \ / o	126,20, 25	126	20	126	25 136:20-25 Relevance, probative value	204.10-10	204	10	204	10	
12/16/2021	Adam Vary	136:20-25	136	20	136	· ·						
						substantially outweighed by a danger of						
						confusing the issues, undue delay, wasting	254 22 255 2	254	22	266		
10/15/2021		107.1.11	10-		407		264:22-266:3	264	22	266	3	
12/16/2021	Adam Vary	137:1-11	137	1	137	11 137:1-11 Relevance, probative value						
						substantially outweighed by a danger of						
						confusing the issues, undue delay, wasting						Speculation/lacks personal knowledge (FRE
						time.	266:13-18	266	13	266	18	602); best evidence

12/16/2021	Adam Vary	137:13-18	137	13	137	18 137:13-18 Relevance, probative value					
						substantially outweighed by a danger of					6
						confusing the issues, undue delay, wasting time.	266:21-25	266	24	200	Speculation/lacks personal knowledge (FRE
12/16/2021	Adam Vary	137:23-24	137	23	137	24 137:23-24 Relevance, probative value	200:21-25	266	21	266	25 602); best evidence
12/16/2021	Audili Valy	157.25-24	157	23	137	substantially outweighed by a danger of					
						confusing the issues, undue delay, wasting					Relevance (FRE 401); undue consumption of
						time.	267:2-3	267	2	267	3 time, confuses the issues (FRE 403)
12/16/2021	Adam Vary	138:3-9	138	3	138	9 138:3-9 Relevance, probative value					
	•					substantially outweighed by a danger of					
						confusing the issues, undue delay, wasting					Relevance (FRE 401); undue consumption of
						time.	267:10-14	267	10	267	14 time, confuses the issues (FRE 403)
12/16/2021	Adam Vary	138:10-12	138	10	138	12 138:10-12 Relevance, probative value					
						substantially outweighed by a danger of					
						confusing the issues, undue delay, wasting	267.46.24	267	4.6	267	24
12/16/2021	A da \/a	138:23-139:6	138	23	139	time. 6 138:23-25 Relevance, probative value	267:16-21	267	16	267	21
12/16/2021	Adam Vary	138:23-139:0	138	23	139	substantially outweighed by a danger of					
						confusing the issues, undue delay, wasting					Speculation/lacks personal knowledge (FRE
						time.	268:2-6	268	2	268	6 (602); best evidence
12/16/2021	Adam Vary	139:9-11	139	9	139	11 139:9-11 Relevance, probative value	200.2 0	200		200	0 002), best evidence
, , ,	,					substantially outweighed by a danger of					
						confusing the issues, undue delay, wasting					Speculation/lacks personal knowledge (FRE
						time.	268:10-12	268	10	268	12 602); best evidence
12/16/2021	Adam Vary	139:13-14	139	13	139	14 139:13-14 Relevance, probative value					
						substantially outweighed by a danger of					
						confusing the issues, undue delay, wasting					Speculation/lacks personal knowledge (FRE
						time.	268:19-22	268	19	268	22 602); best evidence
12/16/2021	Adam Vary	139:17-21	139	17	139	21 139:17-21 Relevance, probative value substantially outweighed by a danger of					
						confusing the issues, undue delay, wasting					Speculation/lacks personal knowledge (FRE
						time.	268:24-269:1	268	24	269	1 602); best evidence
12/16/2021	Adam Vary	140:8-10	140	8	140	10	200.24 203.1	200	24	203	1 002), best evidence
12, 10, 2021	7.00	1.0.0 10	1.0		2.0	140:8-10 Privilege asserted by witness.					
						Relevance, probative value substantially					
						outweighed by a danger of unfair prejudice,					
						confusing the issues, misleading the jury,					Speculation/lacks personal knowledge (FRE
						undue delay, wasting time.	269:3-269:3	269	3	269	3 602); best evidence
12/16/2021	Adam Vary	140:17-18	140	17	140	18 140:17-18 Nonresponsive. The witness					
						refused to answer the question on the					
						advice of counsel asserting privilege and					
						therefore the answer has no evidentiary value.	269:6-8	269	c	269	0
12/16/2021	Adam Vary	140:20-22	140	20	140	22 140:20-22 Relevance, probative value	203.0-0	209	О	209	0
12, 10, 2021	Additi valy	140.20-22	140	20	140	substantially outweighed by a danger of					
						confusing the issues, undue delay, wasting					270:2-4: Calls for speculation (FRE 602);
						time.	269:17-270:4	269	17	270	4 incomplete hypothetical

12/16/2021	Adam Vary	141:3-18	1.11	2	141	10					
12/16/2021	Adam vary	141:3-18	141	3	141	18 141:3-15 Relevance, probative value					
						substantially outweighed by a danger of					
						confusing the issues, undue delay, wasting					
						time; 141:16:18 Privilege asserted by					
						=					
						witness. Relevance, probative value					
						substantially outweighed by a danger of unfair prejudice, confusing the issues,					
						· · · · · · · · · · · · · · · · · · ·					Calls for speculation (FRE 602); incomplete
						misleading the jury, undue delay, wasting time.	270:8-12	270	0	270	12 hypothetical
12/16/2021	Adam Vary	141:24-25	141	24	141	25 141:24-25 Nonresponsive. The witness	270.6-12	270	0	270	12 пуроспецса
12/10/2021	Audili vary	141.24-25	141	24	141	refused to answer the question on the					
						advice of counsel asserting privilege and					
						therefore the answer has no evidentiary					Calls for speculation (FRE 602); incomplete
						value.	270:14-16	270	14	270	16 hypothetical; compound
12/16/2021	Adam Vary	142:2-18	142	2	142	18	270.14-10	270	14	270	10 hypothetical, compound
12/10/2021	Audili Valy	142.2-10	142	2	142	142:2-15 Relevance, probative value					
						substantially outweighed by a danger of					
						confusing the issues, undue delay, wasting					
						time; 142:16-18 Privilege asserted by					
						witness. Relevance, probative value					
						substantially outweighed by a danger of					
						unfair prejudice, confusing the issues,					improper opinion testimony about general
						misleading the jury, undue delay, wasting					media practices (FRE 701, 702); relevance
						time.	270:21-25	270	21	270	25 (FRE 401)
12/16/2021	Adam Vary	142:25-143:1	142	25	143	1 142:25-143:1 Nonresponsive. The witness					
						refused to answer the question on the					
						advice of counsel asserting privilege and					
						therefore the answer has no evidentiary					
						value.					
12/16/2021	Adam Vary	143:3-5	143	3	143	5					
						143:3-5 Privilege asserted by witness.					
						Relevance, probative value substantially					
						outweighed by a danger of unfair prejudice,					
						confusing the issues, misleading the jury,					
						undue delay, wasting time, argumentative,					
						lacks foundation.					
12/16/2021	Adam Vary	143:12-13	143	12	143	13 143:12-13 Nonresponsive. The witness					
						refused to answer the question on the					
						advice of counsel asserting privilege and					
						therefore the answer has no evidentiary					
						value.					
12/16/2021	Adam Vary	143:15-18	143	15	143	18					
						143:15-18 Privilege asserted by witness.					
						Relevance, probative value substantially					
						outweighed by a danger of unfair prejudice,					
						confusing the issues, misleading the jury,					
						undue delay, wasting time, argumentative,					
						lacks foundation.					

12/16/2021	Adam Vary	143:25-144:1	143	25	144	1 143:25-144:1 Nonresponsive. The witness
12/16/2021	Auaiii vary	143.25-144.1	143	25	144	refused to answer the question on the
						advice of counsel asserting privilege and
						therefore the answer has no evidentiary
						value.
12/16/2021	Adam Vary	144:3-5	14	43	144	5
12,10,2021	riddiii vary	144.5 5		73	1-1-1	143:3-144:Privilege asserted by witness.
						Relevance, probative value substantially
						outweighed by a danger of unfair prejudice,
						confusing the issues, misleading the jury,
						undue delay, wasting time, argumentative,
						lacks foundation.
12/16/2021	Adam Vary	144:13-14	144	13	144	14 144:13-14 Nonresponsive. The witness
' '	,					refused to answer the question on the
						advice of counsel asserting privilege and
						therefore the answer has no evidentiary
						value.
12/16/2021	Adam Vary	144:16-18	144	16	144	18
						144:16-18 Privilege asserted by witness.
						Relevance, probative value substantially
						outweighed by a danger of unfair prejudice,
						confusing the issues, misleading the jury,
						undue delay, wasting time, argumentative,
						lacks foundation.
12/16/2021	Adam Vary	145:1-2	145	1	145	2
						145:1-2 Nonresponsive. The witness refused
						to answer the question on the advice of
						counsel asserting privilege and therefore the
						answer has no evidentiary value.
12/16/2021	Adam Vary	146:2-3	146	2	146	3
						146:2-3 Privilege asserted by witness.
						Relevance, probative value substantially
						outweighed by a danger of unfair prejudice,
						confusing the issues, misleading the jury,
						undue delay, wasting time, argumentative,
						lacks foundation.
12/16/2021	Adam Vary	146:12-13	146	12	146	13 146:12-13 Nonresponsive. The witness
						refused to answer the question on the
						advice of counsel asserting privilege and
						therefore the answer has no evidentiary
42/46/2024	A days Mays	147.5.0	4.47	-	4.47	value.
12/16/2021	Adam Vary	147:5-8	147	5	147	8
						147:5-8 Privilege asserted by witness.
						Relevance, probative value substantially
						outweighed by a danger of unfair prejudice,
						confusing the issues, misleading the jury,
						undue delay, wasting time, argumentative, lacks foundation.
12/16/2021	Adam Vans	147,12 12	147	12	1.47	
12/16/2021	Adam Vary	147:12-13	147	12	147	13 147:12-13 Nonresponsive. The witness
						refused to answer the question on the advice of counsel asserting privilege and
						therefore the answer has no evidentiary
						value.
						value.

12/16/2021	A da \ / a	147.15 10	1.47	1.5	1.47	10	Г	1	
12/16/2021	Adam Vary	147:15-18	147	15	147	18	i		
						147:15-18 Privilege asserted by witness.	1		
						Relevance, probative value substantially	1		
						outweighed by a danger of unfair prejudice,	1		
						confusing the issues, misleading the jury,	1		
						undue delay, wasting time, argumentative,	i		
12/15/2021		147.05.440.4	447	25	4.40	lacks foundation.			
12/16/2021	Adam Vary	147:25-148:1	147	25	148	1 147:25-148:1 Nonresponsive. The witness	i		
						refused to answer the question on the	1		
						advice of counsel asserting privilege and	i		
						therefore the answer has no evidentiary	1		
12/16/2021	A da \ / a	148:3-17	148	3	1.40	value.	+		
12/16/2021	Adam Vary	148:18-19	148	18	148 148	17 19	 	-	
	Adam Vary		148	24	148	19	 		
12/16/2021	Adam Vary	148:24-149:10	148	24	149	149:8-10 Privilege asserted by witness.	1		
							1		
						Relevance, probative value substantially	1		
						outweighed by a danger of unfair prejudice,	i		
						confusing the issues, misleading the jury,	1		
						undue delay, wasting time, argumentative, lacks foundation.	i		
12/16/2021	Adam Vanz	149:18-19	149	18	149	19 149:18-19 Nonresponsive. The witness	+		
12/16/2021	Adam Vary	149:18-19	149	18	149	refused to answer the question on the	i		
						·	i		
						advice of counsel asserting privilege and	1		
						therefore the answer has no evidentiary value.	1		
12/16/2021	Adam Vary	149:21-150:10	149	21	150	value.	+		
12/16/2021	Adam Vary	154:24-156:6	154	21 24	156	6	 		
12/16/2021	Adam Vary	156:19-157:1	156	19	157	1	 		
12/16/2021	Adam Vary	157:8-18	157	0	157	18	+		
12/16/2021	Audili Vary	157.6-16	15/	٥	15/	157:12-18 Privilege asserted by witness.	i		
						Relevance, probative value substantially	1		
						outweighed by a danger of unfair prejudice,	1		
						confusing the issues, misleading the jury,	1		
						undue delay, wasting time.	1		
12/16/2021	Adam Vary	157:22-23	157	22	157	23 157:22-23 Nonresponsive. The witness	 		
12/10/2021	Audili vary	157.22-25	15/	22	15/	refused to answer the question on the	1		
						advice of counsel asserting privilege and	1		
						therefore the answer has no evidentiary	1		
						value.	1		
12/16/2021	Adam Van	157:25-158:1	157	25	158	value.	 		
12/10/2021	Adam Vary	137.23-130.1	15/	25	130	157:25-158:1 Privilege asserted by witness.	i l		
						Relevance, probative value substantially	i		
						· · · · · · · · · · · · · · · · · · ·	i		
						outweighed by a danger of unfair prejudice,	i		
						confusing the issues, misleading the jury,	i l		
						undue delay, wasting time, argumentative, lacks foundation.	i l		
12/16/2021	Adam Vari	150,11 17	150	11	150		 	+	
12/16/2021	Adam Vary	158:11-17	158	11	158	17 158:11-12 Nonresponsive. The witness	i l		
1						refused to answer the question on the	i l		
1						advice of counsel asserting privilege and	i l		
						therefore the answer has no evidentiary	i l		
						value.	<u>. </u>	I	

12/15/2021	[a.t. \rangle	450.04.450.40	450	2.	450	
12/16/2021	Adam Vary	158:24-159:13	158	24	159	13
						159:3-13 Privilege asserted by witness.
						Relevance, probative value substantially
						outweighed by a danger of unfair prejudice,
						confusing the issues, misleading the jury,
						undue delay, wasting time, argumentative,
12/16/2021	A dama Maria	450.22.24	450	22	450	lacks foundation.
12/16/2021	Adam Vary	159:23-24	159	23	159	24 159:23-24 Nonresponsive. The witness refused to answer the question on the
						advice of counsel asserting privilege and
						therefore the answer has no evidentiary
						value.
12/16/2021	Adam Vary	160:2-25	160	2	160	
12/16/2021	Adam Vary	161:9-10	161	9	161	10
12/16/2021	Adam Vary	162:10-16	162	10	162	16
12/16/2021	Adam Vary	162:20-163:8	162	20	163	
12/16/2021	Adam Vary	163:20-164:8	163	20	164	8
12, 10, 2021	7.00	100.20 10	100		20.	164:6-8 Privilege asserted by witness.
						Relevance, probative value substantially
						outweighed by a danger of unfair prejudice,
						confusing the issues, misleading the jury,
						undue delay, wasting time, argumentative,
						lacks foundation.
12/16/2021	Adam Vary	164:15-22	164	15	164	22 164:15-16 Nonresponsive. The witness
' '	,					refused to answer the question on the
						advice of counsel asserting privilege and
						therefore the answer has no evidentiary
						value; 164:18-22 Argumentative, lacks
						foundation.
12/16/2021	Adam Vary	165:2-11	165	2	165	11
12/16/2021	Adam Vary	166:13-16	166	13	166	16
						166:13-16 Privilege asserted by witness.
						Relevance, probative value substantially
						outweighed by a danger of unfair prejudice,
						confusing the issues, misleading the jury,
						undue delay, wasting time, argumentative,
						lacks foundation.
12/16/2021	Adam Vary	166:24-25	166	24	166	25 166:24-25 Nonresponsive. The witness
						refused to answer the question on the
						advice of counsel asserting privilege and
						therefore the answer has no evidentiary
		1.22				value.
12/16/2021	Adam Vary	167:1-12	167	1	167	12
						ACT O COLUMN AND AND AND AND AND AND AND AND AND AN
						167:2-9 Relevance, probative value
						substantially outweighed by a danger of
						confusing the issues, undue delay, wasting
						time, cumulative. 167:10-12 Privilege
						asserted by witness. Relevance, probative
						value substantially outweighed by a danger of unfair prejudice, confusing the issues,
						misleading the jury, undue delay, wasting
						time, argumentative, lacks foundation.
						unic, argumentative, iacks tounidation.

12/16/2021	Adam Vary	167:19-20	167	19	167	20 167:19-20 Nonresponsive. The witness
12/16/2021	Addili vary	167.19-20	107	19	107	refused to answer the question on the
						advice of counsel asserting privilege and
						therefore the answer has no evidentiary
						value.
12/16/2021	Adam Vary	167:22-24	167	22	167	24
12/10/2021	Addin vary	107.22-24	107	22	107	167:22-24 Privilege asserted by witness.
						Relevance, probative value substantially
						outweighed by a danger of unfair prejudice,
						confusing the issues, misleading the jury,
						undue delay, wasting time, argumentative,
						lacks foundation.
12/16/2021	Adam Vary	168:7-8	168	7	168	8
12, 10, 2021	7.00	20017 0	100	1	200	168:7-8 Nonresponsive. The witness refused
						to answer the question on the advice of
						counsel asserting privilege and therefore the
						answer has no evidentiary value.
12/16/2021	Adam Vary	170:1-3	170	1	170	3
,,	,					170:1-3 Privilege asserted by witness.
						Relevance, probative value substantially
						outweighed by a danger of unfair prejudice,
						confusing the issues, misleading the jury,
						undue delay, wasting time.
12/16/2021	Adam Vary	170:9-10	170	9	170	10 170:9-10 Nonresponsive. The witness
						refused to answer the question on the
						advice of counsel asserting privilege and
						therefore the answer has no evidentiary
						value.
12/16/2021	Adam Vary	171:20-22	171	20	171	22
						171:20-22 Privilege asserted by witness.
						Relevance, probative value substantially
						outweighed by a danger of unfair prejudice,
						confusing the issues, misleading the jury,
						undue delay, wasting time, argumentative,
						lacks foundation.
12/16/2021	Adam Vary	172:4-5	172	4	172	5
						172:4-5 Nonresponsive. The witness refused
						to answer the question on the advice of
						counsel asserting privilege and therefore the
						answer has no evidentiary value.
12/16/2021	Adam Vary	172:7-15	172	7	172	15
12/16/2021	Adam Vary	172:25-174:1	172	25	174	
						172:25-173:23 Relevance, probative value
						substantially outweighed by a danger of
						confusing the issues, undue delay, wasting
						time, cumulative. 173:24-174:1 Privilege
						asserted by witness. Relevance, probative
						value substantially outweighed by a danger
						of unfair prejudice, confusing the issues,
						misleading the jury, undue delay, wasting
						time, argumentative, lacks foundation.

12/16/2021	Adam Vary	174:6-7	174	6	174	7
12/10/2021	Audili Valy	174.0-7	1/4	U	1/4	174:6-7 Nonresponsive. The witness refused
						to answer the question on the advice of
						counsel asserting privilege and therefore the
						answer has no evidentiary value.
12/16/2021	Adam Vary	174:9-11	174	9	174	11
12/ 20/ 2021	7.00	17.13.11	-7.		-7.	174:9-11 Privilege asserted by witness.
						Relevance, probative value substantially
						outweighed by a danger of unfair prejudice,
						confusing the issues, misleading the jury,
						undue delay, wasting time, argumentative,
						lacks foundation.
12/16/2021	Adam Vary	174:17-18	174	17	174	18 174:17-18 Nonresponsive. The witness
						refused to answer the question on the
						advice of counsel asserting privilege and
						therefore the answer has no evidentiary
						value.
12/16/2021	Adam Vary	174:20-175:4	174	20	175	4 174:20-175:4 Relevance, probative value
						substantially outweighed by a danger of
						confusing the issues, undue delay, wasting
						time.
12/16/2021	Adam Vary	175:23-176:10	175	23	176	10 175:23-176:10 Relevance, probative value
						substantially outweighed by a danger of
						confusing the issues, undue delay, wasting
						time.
12/16/2021	Adam Vary	176:17-21	176	17	176	23 176:17-23 Relevance, probative value
						substantially outweighed by a danger of
						confusing the issues, undue delay, wasting
						time.
12/16/2021	Adam Vary	177:3-5	177	3	177	5 177:3-5 Relevance, probative value
						substantially outweighed by a danger of
						confusing the issues, undue delay, wasting
				_		time.
12/16/2021	Adam Vary	177:7-8	177	7	177	8
						177:7-8 Privilege asserted by witness.
						Relevance, probative value substantially
						outweighed by a danger of unfair prejudice,
						confusing the issues, misleading the jury,
42/46/2024	A days Mays	177.16.17	177	16	177	undue delay, wasting time.
12/16/2021	Adam Vary	177:16-17	1//	16	1//	17 177:16-17 Nonresponsive. The witness refused to answer the question on the
						advice of counsel asserting privilege and
						therefore the answer has no evidentiary
						value.
12/16/2021	Adam Vary	177:19-22	177	19	177	22
12/10/2021	Audili Valy	111.13-22	1//	13	1//	177:19-22 Privilege asserted by witness.
						Relevance, probative value substantially
						outweighed by a danger of unfair prejudice,
						confusing the issues, misleading the jury,
						undue delay, wasting time, lacks foundation.
	1				l l	and actiff and total control and total

12/16/2021	Adam Vary	178:6-7	178	6	178	7			
12/10/2021	Adam vary	178.0-7	1/8	O	1/0	178:6-7 Nonresponsive. The witness refused			
						to answer the question on the advice of			
						counsel asserting privilege and therefore the			
						answer has no evidentiary value.			
12/16/2021	Adam Vary	178:9-12	178	q	178	12			
12/10/2021	Additi vary	170.5 12	170	٦	1,0	178:9-12 Privilege asserted by witness.			
						Relevance, probative value substantially			
						outweighed by a danger of unfair prejudice,			
						confusing the issues, misleading the jury,			
						undue delay, wasting time, lacks foundation,			
						argumentative.			
12/16/2021	Adam Vary	178:20-21	178	20	178	21 178:20-21 Nonresponsive. The witness			
12/10/2021	/ dam vary	170.20 21	170	20	1,0	refused to answer the question on the			
						advice of counsel asserting privilege and			
						therefore the answer has no evidentiary			
						value.			
12/16/2021	Adam Vary	179:13-16	179	13	179	16			
12/10/2021	/ dam vary	173.13 10	1,3	13	1,3	179:13-16 Privilege asserted by witness.			
						Relevance, probative value substantially			
						outweighed by a danger of unfair prejudice,			
						confusing the issues, misleading the jury,			
						undue delay, wasting time, argumentative,			
						lacks foundation.			
12/16/2021	Adam Vary	179:19-20	179	19	179	20 179:19-20 Nonresponsive. The witness			
12, 20, 2022	7.44	275125 20	2.3		27.5	refused to answer the question on the			
						advice of counsel asserting privilege and			
						therefore the answer has no evidentiary			
						value.			
12/16/2021	Adam Vary	179:22-24	179	22	179	24			
						179:22-24 Privilege asserted by witness.			
						Relevance, probative value substantially			
						outweighed by a danger of unfair prejudice,			
						confusing the issues, misleading the jury,			
						undue delay, wasting time, argumentative,			
						lacks foundation.			
12/16/2021	Adam Vary	180:5-6	180	5	180	6			
						180:5-6 Nonresponsive. The witness refused			
						to answer the question on the advice of			
						counsel asserting privilege and therefore the			
						answer has no evidentiary value.			
12/16/2021	Adam Vary	180:8-10	180	8	180	10			
						180:8-10 Privilege asserted by witness.			
						Relevance, probative value substantially			
						outweighed by a danger of unfair prejudice,			
						confusing the issues, misleading the jury,			
						undue delay, wasting time.			
12/16/2021	Adam Vary	180:16-17	180	16	180	17 180:16-17 Nonresponsive. The witness			
						refused to answer the question on the			
						advice of counsel asserting privilege and			
						therefore the answer has no evidentiary			
						value.			

	1	Tiere					T T	1	1	1	T
12/16/2021	Adam Vary	181:5-9	181	5	181	9					
						181:5-9 Privilege asserted by witness.					
						Relevance, probative value substantially					
						outweighed by a danger of unfair prejudice,					
						confusing the issues, misleading the jury,					
						undue delay, wasting time.			+		
12/16/2021	Adam Vary	181:15-16	181	15	181	16 181:15-16 Nonresponsive. The witness					
						refused to answer the question on the					
						advice of counsel asserting privilege and					
						therefore the answer has no evidentiary					
						value.			1		
12/16/2021	Adam Vary	181:18-20	181	18	181	20 181:18-20 Relevance, probative value					
						substantially outweighed by a danger of					
						confusing the issues, undue delay, wasting					
						time.			1		
12/16/2021	Adam Vary	181:23-24	181	23	181	24 181:23-23 Relevance, probative value					
						substantially outweighed by a danger of					
						confusing the issues, undue delay, wasting					
						time.					
12/16/2021	Adam Vary	182:2-4	182	2	182	4					
						182:2-4 Privilege asserted by witness.					
						Relevance, probative value substantially					
						outweighed by a danger of unfair prejudice,					
						confusing the issues, misleading the jury,					
						undue delay, wasting time, vague.					
12/16/2021	Adam Vary	182:11-12	182	11	182	12 182:11-12 Nonresponsive. The witness					
						refused to answer the question on the					
						advice of counsel asserting privilege and					
						therefore the answer has no evidentiary					
						value.					
12/16/2021	Adam Vary	182:14-18	182	14	182	18					
						182:14-18 Privilege asserted by witness.					
						Relevance, probative value substantially					
						outweighed by a danger of unfair prejudice,					
						confusing the issues, misleading the jury,					
						undue delay, wasting time.					
12/16/2021	Adam Vary	182:24-25	182	24	182	25 182:24-25 Nonresponsive. The witness					
						refused to answer the question on the					
						advice of counsel asserting privilege and					
						therefore the answer has no evidentiary					
						value.					
12/16/2021	Adam Vary	183:2-6	183	2	183	6					
						183:2-6 Privilege asserted by witness.					
						Relevance, probative value substantially					
						outweighed by a danger of unfair prejudice,					
						confusing the issues, misleading the jury,					
						undue delay, wasting time, argumentative,					
						lacks foundation.					
12/16/2021	Adam Vary	183:13-14	183	13	183	14 183:13-14 Nonresponsive. The witness					
						refused to answer the question on the					
						advice of counsel asserting privilege and					
1						therefore the answer has no evidentiary					
						value.			1		
•										•	

12/16/2021	Adam Vary	183:16-18	183	16	183	18 Relevance, probative value substantially				
12/16/2021	Adam Vary	183:25-184:1	183	25	184	1 refused to answer the question on the				
12/16/2021	Adam Vary	188:25-189:2	188	25	189	2			+	
12/10/2021	Addin vary	100.23 103.2	100	23	103	188:25-198:2 Privilege asserted by witness.				
						Relevance, probative value substantially				
						outweighed by a danger of unfair prejudice,				
						confusing the issues, misleading the jury,				
						undue delay, wasting time.				
12/16/2021	Adam Van	189:8-9	189	0	189	o dilude delay, wasting time.				
12/16/2021	Adam Vary	169.6-9	109	٥	169	189:8-9 Nonresponsive. The witness refused				
						to answer the question on the advice of				
						·				
						counsel asserting privilege and therefore the				
10/16/2021	A.1. 1/	100 17 100 1	100	4.7	100	answer has no evidentiary value.				
12/16/2021	Adam Vary	189:17-190:1	189	17	190	1 189:17-190:1 Relevance, probative value				
						substantially outweighed by a danger of				
						confusing the issues, undue delay, wasting				
						time.				
12/16/2021	Adam Vary	190:5-6	190	5	190	6 190:5-6 Relevance, probative value				
						substantially outweighed by a danger of				
						confusing the issues, undue delay, wasting				
						time.				
12/16/2021	Adam Vary	190:13-17	190	13	190	17 190:13-17 Relevance, probative value				
						substantially outweighed by a danger of				
						confusing the issues, undue delay, wasting				
						time.				
12/16/2021	Adam Vary	190:23-25	190	23	190	25 190:23-25 Relevance, probative value				
						substantially outweighed by a danger of				
						confusing the issues, undue delay, wasting				
						time.				
12/16/2021	Adam Vary	195:13-22	195	13	195	22 195:13-22 Relevance, probative value				
						substantially outweighed by a danger of				
						confusing the issues, undue delay, wasting				
						time, cumulative.				
12/16/2021	Adam Vary	196:18-197:1	196	18	197	1 196:18-197:1 Relevance, probative value				
	·					substantially outweighed by a danger of				
						confusing the issues, undue delay, wasting				
						time, cumulative.				
12/16/2021	Adam Vary	199:20-23	199	20	199	23				
' ' '	, ,					199:20-23 Privilege asserted by witness.				
						Relevance, probative value substantially				
						outweighed by a danger of unfair prejudice,				
						confusing the issues, misleading the jury,				
						undue delay, wasting time.				
12/16/2021	Adam Vary					and a delay, wasting time.		+		-
12/10/2021	Audin Vary					200:6-7 Nonresponsive. The witness refused				
						to answer the question on the advice of				
						counsel asserting privilege and therefore the				
		200:6-7	200	6	200	7 answer has no evidentiary value.				
		200.0-7	200	O	200	/ Janswer has no evidentiary value.				

12/16/2021	Adam Vary	200:9-11	200	a	200	11			1	
12/10/2021	Additi vary	200.9-11	200	3	200	200:9-11 Privilege asserted by witness.				
						Relevance, probative value substantially				
						outweighed by a danger of unfair prejudice,				
						confusing the issues, misleading the jury,				
						undue delay, wasting time, lacks foundation,				
						calls for speculation.				
12/16/2021	Adam Vary	200:19-20	200	19	200	20 200:19-20 Nonresponsive. The witness				
12/10/2021	Addili valy	200.13-20	200	13	200	refused to answer the question on the				
						advice of counsel asserting privilege and				
						therefore the answer has no evidentiary				
						value.				
12/16/2021	Adam Vary	200:24-201:1	200	24	201	1				
12/10/2021	Addin vary	200.24 201.1	200	2-7	201	200:24-201 Privilege asserted by witness.				
						Relevance, probative value substantially				
						outweighed by a danger of unfair prejudice,				
						confusing the issues, misleading the jury,				
						undue delay, wasting time, lacks foundation,				
						calls for speculation.				
12/16/2021	Adam Vary	201:9-10	201	g	201	10 201:9-10 Nonresponsive. The witness				
12/10/2021	Addin vary	201.5 10	201	,	201	refused to answer the question on the				
						advice of counsel asserting privilege and				
						therefore the answer has no evidentiary				
						value.				
12/16/2021	Adam Vary	201:14-22	201	14	201	22 201:14-22 Relevance, probative value				
12/10/2021	Addin vary	201.14 22	201		201	substantially outweighed by a danger of				
						confusing the issues, undue delay, wasting				
						time, cumulative.				
12/16/2021	Adam Vary	202:11-12	202	11	202	12				
12, 10, 2021	7.00	202.22 22	202		202	202:11-12 Privilege asserted by witness.				
						Relevance, probative value substantially				
						outweighed by a danger of unfair prejudice,				
						confusing the issues, misleading the jury,				
						undue delay, wasting time.				
12/16/2021	Adam Vary	202:19-20	202	19	202	20 202:19-20 Nonresponsive. The witness				
, , ,	,					refused to answer the question on the				
						advice of counsel asserting privilege and				
						therefore the answer has no evidentiary				
						value.				
12/16/2021	Adam Vary	202:22-24	202	22	202	24				
	,					202:22-24 Privilege asserted by witness.			1	
						Relevance, probative value substantially				
						outweighed by a danger of unfair prejudice,				
						confusing the issues, misleading the jury,				
						undue delay, wasting time, calls for			1	
1						speculation.			1	
12/16/2021	Adam Vary	203:6-7	203	6	203	7				
, , , , , , , , , , , , , , , , , , , ,						203:6-7 Nonresponsive. The witness refused			1	
						to answer the question on the advice of			1	
1						counsel asserting privilege and therefore the			1	
1						answer has no evidentiary value.			1	
L	1	L		ı	l l		I.	1 1	 1	

12/16/2021	Adam Vary	203:9-11	203	0	203	11				1	
12/16/2021	Audili Vary	205.9-11	203	9	203	203:9-11 Privilege asserted by witness.					
						Relevance, probative value substantially					
						outweighed by a danger of unfair prejudice,					
						confusing the issues, misleading the jury,					
						undue delay, wasting time.					
12/16/2021	Adam Vary	203:18-19	203	18	203	19 203:18-19 Nonresponsive. The witness					
12/10/2021	Audili Valy	203.18-19	203	10	203	refused to answer the question on the					
						advice of counsel asserting privilege and					
						therefore the answer has no evidentiary					
						value.					
12/16/2021	Adam Vary	203:21-204:7	203	21	204	7 203:21-204:7 Relevance, probative value					
12/10/2021	Addin vary	203.21 204.7	203	21	204	substantially outweighed by a danger of					
						confusing the issues, undue delay, wasting					
						time, cumulative.					
12/16/2021	Adam Vary	208:6-18	208	6	208	18 208:6-18 Relevance, probative value					
12/10/2021	Addin vary	200.0 10	200	· ·	200	substantially outweighed by a danger of					
						confusing the issues, undue delay, wasting					
						time, cumulative.					
12/16/2021	Adam Vary	208:25-209:2	208	25	208	2 208:25-209:2 Relevance, probative value					
12/10/2021	ridain vary	200.23 203.2	200	23	200	substantially outweighed by a danger of					
						confusing the issues, undue delay, wasting					
						time, cumulative.					
12/16/2021	Adam Vary	209:11-13	209	11	209	13					
12/10/2021	ridain vary	203.11 13	203		203	209:11-13 Privilege asserted by witness.					
						Relevance, probative value substantially					
						outweighed by a danger of unfair prejudice,					
						confusing the issues, misleading the jury,					
						undue delay, wasting time.					
12/16/2021	Adam Vary	209:20-21	209	20	209	21 209:20-21 Nonresponsive. The witness					
,,	, ,					refused to answer the question on the					
						advice of counsel asserting privilege and					
						therefore the answer has no evidentiary					
						value.					
12/16/2021	Adam Vary	209:23-210:1	209	23	210	1					
,,						209:23-210:1 Privilege asserted by witness.					
						Relevance, probative value substantially					
						outweighed by a danger of unfair prejudice,					
						confusing the issues, misleading the jury,					
						undue delay, wasting time.					
12/16/2021	Adam Vary	210:8-9	201	8	201	9				1	
, , ,	, ,					210:8-9 Nonresponsive. The witness refused					
						to answer the question on the advice of					
						counsel asserting privilege and therefore the					
						answer has no evidentiary value.					
12/16/2021	Adam Vary	213:16-214:2	213	16	214	2					
, .	' '					213:16-214:2 Privilege asserted by witness.					
1						Relevance, probative value substantially				1	
						outweighed by a danger of unfair prejudice,					
						confusing the issues, misleading the jury,					
1						undue delay, wasting time, calls for				1	
						speculation.					
l		1	1				I	<u> </u>	ı	1	1

12/16/2021	Adam Vary	214:10-11	214	10	214	11 214:10-11 Nonresponsive. The witness	Г	<u> </u>			7
12/16/2021	Audili Vary	214.10-11	214	10	214	refused to answer the question on the					
						advice of counsel asserting privilege and					
						therefore the answer has no evidentiary					
						value.					
12/16/2021	Adam Vary	214:14-15	214	14	214	15	+		1		
12/10/2021	ridain vary	217.17 13	224			214:14-15 Privilege asserted by witness.					
						Relevance, probative value substantially					
						outweighed by a danger of unfair prejudice,					
						confusing the issues, misleading the jury,					
						undue delay, wasting time, lacks foundation.					
12/16/2021	Adam Vary	215:1-2	215	1	215	2					
, ,, ,	, ,					215:1-2 Nonresponsive. The witness refused					
						to answer the question on the advice of					
						counsel asserting privilege and therefore the					
						answer has no evidentiary value.					
12/16/2021	Adam Vary	216:6-9	216	6	216	9 216:6-9 Relevance, probative value					
						substantially outweighed by a danger of					
						confusing the issues, undue delay, wasting					
						time, Best Evidence Rule.					
12/16/2021	Adam Vary	216:13	216	13	216	13 216:13 Relevance, probative value					
						substantially outweighed by a danger of					
						confusing the issues, undue delay, wasting					
						time, Best Evidence Rule.					
12/16/2021	Adam Vary	216:18-217:2	216	18	217	2					
						216:18-217:2 Relevance, probative value					
						substantially outweighed by a danger of					
						confusing the issues, undue delay, wasting					
						time, Best Evidence Rule.					
12/16/2021	Adam Vary	217:6-9	217	6	217	9 217:6-9 Relevance, probative value					
						substantially outweighed by a danger of					
						confusing the issues, undue delay, wasting					
						time, Best Evidence Rule.					
12/16/2021	Adam Vary	217:11-12	217	11	217	12					
						217:11-12 Privilege asserted by witness.					
						Relevance, probative value substantially					
						outweighed by a danger of unfair prejudice,					
						confusing the issues, misleading the jury,					
						undue delay, wasting time, argumentative,					
						lacks foundation, assuming facts not in					
42/46/2024	A days May	247-24-240-4	247	24	240	evidence.	-				
12/16/2021	Adam Vary	217:21-218:1	217	21	218	1 217:21-218:1 Nonresponsive. The witness					
						refused to answer the question on the					
						advice of counsel asserting privilege and					
						therefore the answer has no evidentiary value.					
12/16/2021	Adam Vary	218:3-6	218	2	218	value.	+		+ +	+	
12/10/2021	Audiii Vary	210.3-0	218	3	218	218:3-6 Privilege asserted by witness.					
						Relevance, probative value substantially outweighed by a danger of unfair prejudice,					
						confusing the issues, misleading the jury,					
						undue delay, wasting time, lacks foundation.					
L	1					undue delay, washing time, lacks foulldation.	<u>. </u>	1			

12/16/2021	Adam Vary	218:9-12	210	ما	210	12 218:9-12 Nonresponsive. The witness
12/16/2021	Adam vary	218:9-12	218	9	218	refused to answer the question on the
						' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' '
						advice of counsel asserting privilege and
						therefore the answer has no evidentiary
						value.
12/16/2021	Adam Vary	218:14-19	218	14	218	19
						218:14-19 Privilege asserted by witness.
						Relevance, probative value substantially
						outweighed by a danger of unfair prejudice,
						confusing the issues, misleading the jury,
						undue delay, wasting time.
12/16/2021	Adam Vary	219:3-5	219	3	219	5
						219:3-5 Nonresponsive. The witness refused
						to answer the question on the advice of
						counsel asserting privilege and therefore the
						answer has no evidentiary value.
12/16/2021	Adam Vary	219:7-8	219	7	219	8
						219:7-8 Privilege asserted by witness.
						Relevance, probative value substantially
						outweighed by a danger of unfair prejudice,
						confusing the issues, misleading the jury,
						undue delay, wasting time.
12/16/2021	Adam Vary	219:16-18	2`9	16	219	18 219:16-17 Nonresponsive. The witness
						refused to answer the question on the
						advice of counsel asserting privilege and
						therefore the answer has no evidentiary
						value.
12/16/2021	Adam Vary	219:19-20	219	19	219	20
						219:19-20 Privilege asserted by witness.
						Relevance, probative value substantially
						outweighed by a danger of unfair prejudice,
						confusing the issues, misleading the jury,
						undue delay, wasting time.
12/16/2021	Adam Vary	220:2-3	220	2	220	3
' ' '	,					220:2-3 Nonresponsive. The witness refused
						to answer the question on the advice of
						counsel asserting privilege and therefore the
						answer has no evidentiary value.
12/16/2021	Adam Vary	220:5-6	220	5	220	6
	, , ,					220:5-6 Privilege asserted by witness.
						Relevance, probative value substantially
						outweighed by a danger of unfair prejudice,
						confusing the issues, misleading the jury,
						undue delay, wasting time.
12/16/2021	Adam Vary	220:13-14	220	13	220	14 220:13-14 Nonresponsive. The witness
12/10/2021	Audili valy	220.13-14	220	13	220	refused to answer the question on the
						advice of counsel asserting privilege and
						therefore the answer has no evidentiary
						value.

12/16/2021	A dama Mam.	220:16-18	220	16	220	18		1	1
12/16/2021	Adam Vary	220:16-18	220	16	220	-			
						220:16-18 Privilege asserted by witness.			
						Relevance, probative value substantially			
						outweighed by a danger of unfair prejudice,			
						confusing the issues, misleading the jury,			
						undue delay, wasting time.			
12/16/2021	Adam Vary	220:25-221:1	220	25	221	1 220:25-221:1 Nonresponsive. The witness			
						refused to answer the question on the			
						advice of counsel asserting privilege and			
						therefore the answer has no evidentiary			
						value.			
12/16/2021	Adam Vary	221:3-4	221	3	221	4			
12/ 20/ 2021	, adm vary	122.0				221:3-4 Privilege asserted by witness.			
						Relevance, probative value substantially			
						outweighed by a danger of unfair prejudice,			
						confusing the issues, misleading the jury,			
						undue delay, wasting time.			
12/16/2021	Adam Vary	221:11-12	221	11	221	12 221:11-12 Nonresponsive. The witness			
						refused to answer the question on the			
						advice of counsel asserting privilege and			
						therefore the answer has no evidentiary			
						value.			
12/16/2021	Adam Vary	241:4-18	241	4	241	18			
12/16/2021	Adam Vary	241:21-23	241	21	241	23			
12/16/2021	Adam Vary	250:15-23	250	15	250	23 250:15-23 Relevance, probative value			
	·					substantially outweighed by a danger of			
						confusing the issues, undue delay, wasting			
						time.			
12/16/2021	Adam Vary	273:24-274:3	273	24	275	3			
12/10/2021	riaam vary	273.24 274.3	273		2,3	273:24-274:3 Privilege asserted by witness.			
						Relevance, probative value substantially			
						outweighed by a danger of unfair prejudice,			
						confusing the issues, misleading the jury,			
						undue delay, wasting time.			
12/16/2021	Adam Vary	274:10-275:4	274	1	275	4			
						274:10-17 Nonresponsive. The witness			
						refused to answer the question on the			
						advice of counsel asserting privilege and			
						therefore the answer has no evidentiary			
						value; 274:19-275:4 Relevance, probative			
						value substantially outweighed by a danger			
					1	of confusing the issues, undue delay,			
						wasting time, lacks foundation, Best			
						Evidence Rule.			
12/16/2021	A da \ /	275.0.12	275	0	275				
12/16/2021	Adam Vary	275:8-12	2/5	ŏ	275	12			
						275:8-12 Relevance, probative value			
1					1	substantially outweighed by a danger of			
						confusing the issues, undue delay, wasting			
						time, lacks foundation, Best Evidence Rule.			

Case 1:20-cv-09586-LAK Document 156-2 Filed 03/04/22 Page 28 of 46

12/16/2021	Adam Vary	275:14-17	275	14	275	275:14-17 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury,
12/16/2021	Adam Vary	275:25-276:1	275	25	276	undue delay, wasting time, lacks foundation. 1 275:25-276:1 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.
12/16/2021	Adam Vary	276:3-6	276	3	276	276:3-6 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, lacks foundation.
12/16/2021	Adam Vary	276:15-17	276	15	276	17 276:15-17 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.

Case 1:20-cv-09586-LAK Document 156-2 Filed 03/04/22 Page 29 of 46

Deposition		Defer	nant Kevin Fowler	's Initial Desig	gnations		Plaintiff Anthony Rapp's Objections	Plaint	tiff Anthony Rapp	's Counter-Des	ignations		Defendant Kevin Fowler's Objections to Counter-Designations
Date	WITNESS	PINCITE	Page Start	Line Start	Page End	Line End	OBJECTION	PINCITE	Page Start	Line Start	Page End	Line End	OBJECTION
1/31/2022	Kathe Green	5:15-23	5	15	5	23		6:12-7:3		12 7	,	3	
1/31/2022	Kathe Green	6:1-11	6	1	6	111		7:11-20		11 7	,	20	
1/31/2022	Kathe Green	10:3-12	10	3	10	12							Relevance (FRE 401); undue consumption o
								8:15-9:14	8	15 9)	14	time (FRE 403)
1/31/2022	Kathe Green	10:24-11:7	10	24	11	7							Relevance (FRE 401); undue consumption o
								9:25-10:2	9	25 1	.0	2	time (FRE 403)
1/31/2022	Kathe Green	13:4-11	13	4	13	11		10:13-10:23	10	12 1	.0	23	
1/31/2022	Kathe Green	14:3-10	14	3	14	10		11:8-9	11	8 1	.1	9	
1/31/2022	Kathe Green	15:1-13	15	1	15	13		11:17-12:25	11	17 1	.2	25	
1/31/2022	Kathe Green	26:4-27:3	26	4	27	3		14:11-21	14	11 1	.4	21	
1/31/2022	Kathe Green	27:17-28:20	27	17	28	20		15:14-17	15	14 1	.5	17	
1/31/2022	Kathe Green	33:25-34:8	33	25	34	8		15:22-16:7	15	22 1	.6	7	
1/31/2022	Kathe Green	34:14-18	34	14	34	18		16:18-23	16	18 1	.6	23	
1/31/2022	Kathe Green	34:24-35:15	34	24	35	15		17:5-14	17	5 1	.7	14	
1/31/2022	Kathe Green	40:9-13	40	9	40	13		18:21-19-8			.9	8	
1/31/2022	Kathe Green	41:9-11	41	9	41	11		19:14-19:24			.9	24	
1/31/2022	Kathe Green	41:18-20	41	18	41	20		21:15-22	21	15 2	!1	22	
1/31/2022	Kathe Green	42:6-11	42	6	42	11	42:6-11 Relevance, probative value substantially outweighed by a danger of						
							confusing the issues, undue delay, wasting time, vague as to time she saw the						
							show.	22:9-13	22	9 2	22	13	
1/31/2022	Kathe Green	44:10-45:6	44	10	45	6	44:10-45:6 Lacks foundation, speculation, no personal knowledge, relies on						
							hearsay, improper lay opinion, relevance, probative value substantially						
							outweighed by a danger of misleading the jury, unfair prejudice, confusing the						
							issues, undue delay, wasting time.	29:14-23	29	14 2	19	23	Relevance (FRE 401)
1/31/2022	Kathe Green	45:20-25	45	20	45	25							30:6-8: Counsels' comments are not
							45:20-25 Objection to everything after "No," as non-responsive.	30:6-16	30	6 3	10	16	evidence
1/31/2022	Kathe Green	46:3-7	46	3	46	7	46:6-7 Objection as non-responsive.	30:22-31:10	30	22 3	31	10	
1/31/2022	Kathe Green	46:9	46	9	46	9	46:9 Objection as non-reponsive.	31:21-32:6	31	21 3	32	6	
1/31/2022	Kathe Green	50:23-25	50	23	50	25		32:15-33:24	32	15 3	13	24	
1/31/2022	Kathe Green	52:25-53:9	52	25	53	9		34:9-13	34	9 3	34	13	
1/31/2022	Kathe Green	54:8-11	54	8	54	11		35:16-18	35	16	35	18	
1/31/2022	Kathe Green	54:15-19	54	15	54	19		36:13-37:12	36	13	37	12	
1/31/2022	Kathe Green	55:22-56:18	55	22	56	18		37:17	37	17 3	37	17	
1/31/2022	Kathe Green	56:25-57:18	56	25	57	18		40:14-18	40	14	10	18	
1/31/2022	Kathe Green	57:25-58:12	57	25	58	12	57:25-58:12 Relevance, probative value substantially outweighed by a danger						
							of confusing the issues, undue delay, wasting time.	41:2-3	41	2 4	1	3	
1/31/2022	Kathe Green	61:9-15	61	9	61	15		41:6-8	41	6 4	1	8	
1/31/2022	Kathe Green	65:5-11	65	5	65	11		41:12-17		12 4	1	17	
1/31/2022	Kathe Green	66:15-67:24	66	15	67	24		43:5-23	43	5 4	13	23	
1/31/2022	Kathe Green	69:1-70:10	69	1	70	10		47:18-48:12	47	18 4	18	12	
1/31/2022	Kathe Green	73:13-18	73	13	73	18	73:13-15 Lacks foundation, calls for speculation.	48:14-49:6	48	14	19	6	
1/31/2022	Kathe Green	74:15-17	74	15	74	17		49:21-50:7			50	7	
1/31/2022	Kathe Green	74:21-75:4	74	21	75	4		50:19-22		19 5	50	22	
1/31/2022	Kathe Green	75:8-22	75	8	75	22		51:1-3	51	1 5	51	3	
1/31/2022	Kathe Green	76:4-6	76	4	76	6		51:7-9	51	7	51	9	
1/31/2022	Kathe Green	76:8-77:3	76	8	77	3		53:10-22			i3	22	
1/31/2022	Kathe Green	77:22-78:8	77	22	78	8		54:5-7	54	5 5	54	7	
1/31/2022	Kathe Green	78:11-21	78	11	78	21	78:13-21 Objection to everything after "I don't know," as calling for speculation						
							and guessing.	54:12-14	54	12 5	54	14	
1/31/2022	Kathe Green	90:15-18	90	15	90	18		54:20-55:15	54	20 5	i5	15	
1/31/2022	Kathe Green	91:23-92:11	91	23	92	11							
							91:23-92:11 Relevance, probative value substantially outweighed by a danger						
							of confusing the issues, undue delay, wasting time, prejudicial, lacks probative						
							value as it was before the time defendant Spacey rented the apartment.	55:20-21	55	20 5	55	21	
1/31/2022	Kathe Green	92:18-93:1	92	18	93	1	93:1 Objection to form, leading.	59:7-16	59		9	16	

Case 1:20-cv-09586-LAK Document 156-2 Filed 03/04/22 Page 30 of 46

	I	1				darana and an	T	1	12	1		
1/31/2022	Kathe Green	93:4-6	93		93	6 93:5-6 Objection to form, leading.	60:2-8	60	2	60	8	
1/31/2022	Kathe Green	93:9-12	93		93	12 93:10-11 Objection to form, leading.	60:16-62:2	60	16	62		2:1-2: Vouching; Relevance (FRE 401)
1/31/2022	Kathe Green	94:2-5	94		94	5 94:2-5 Objection to form, leading.	62:13-24	62	13	62	24	
1/31/2022	Kathe Green	94:8-9	94		94	9 94:8-9 Non-responsive.	63:5-20	63	4	63	20	
1/31/2022	Kathe Green	94:18-21	94		94	21 94:18-21 Leading, asked and answered, cumulative.	63:24-64:10	63	24	64	10	
1/31/2022	Kathe Green	95:19-22	95		95	22 95:19-21 Objection to form, leading.	65:24-66:7	65	24	66	7	
1/31/2022	Kathe Green	97:4-5	97		97	5 97:4-5 Objection to form, leading.	67:25-68:9	67	25	68	9	
1/31/2022	Kathe Green	97:7-10	97		97	10 97:8-10 Objection to form, leading.	68:15-23	68	15	68	23	
1/31/2022	Kathe Green	97:13-15	97		97	15 97:14-15 Objection to form, leading.	70:11-71:3	70	11	71		0:11-13: Argumentative
1/31/2022	Kathe Green	97:18-20	97		97	20	71:6-13	71	6	71		l:12-13: Vouching
1/31/2022	Kathe Green	98:1-4	98		98	4 98:1-4 Objection to form, leading.	71:15-22	71	15	71	22	
1/31/2022	Kathe Green	100:15-18	100		100	18 100:15-18 Objection to form, leading, vague as to time.	71:25-72:13	71	25	72	13	
1/31/2022	Kathe Green	100:21-25	100	21	101	25 100:21-22 Vague as to time; 100:23-25 Objection to form, leading, lacks foundation, calls for speculation.	72:15-17	72	15	72	17 V	agua.
1 /21 /2022	Kathe Green	101:3-10	101	2	101	10 101: 3-4 Lacks foundation, calls for speculation; 101:5-7, 101:9-10 Objection t		/2	13	/2	17 0	ague
1/31/2022	Katne Green	101:3-10	101	3	101	form, leading.	72:19	72	19	72	19	
1/31/2022	Kathe Green	101:12	101	12	101	12	72:23-24	72	23	72	24	
						14	73:3-12	73	2.3	73	12	
1/31/2022 1/31/2022	Kathe Green Kathe Green	101:14 101:17-24	101 101		101 101	24 101:17-20, 22-23 Objection to form, leading, lacks foundation, calls for	73.3-12	/3	3	/3	12	
1/31/2022	Kathe Green	101:17-24	101	1/	101	speculation, nonresponsive; 101:24 Lacks foundation, calls for speculation,						
						lacks personal knowledge.	73:19-22	73	19	73	22/4	rgumentative
1/21/2022	Katha Crass	102.2.2	102	1	102	1 9	73.19-22	/3	19	/3	22 A	gumentative
1/31/2022	Kathe Green	102:2-3	102	2	102	3 101:2-3 Lacks foundation, calls for speculation, nonresponsive, asked and						
						answered, probative value substantially outweighed by a danger of wasting	77.4.6	77				
1/04/0000	W. II. G	100.5	100		100	time.	77:4-6	//	4	77	6 A	rgumentative
1/31/2022	Kathe Green	102:6	102	6	102	6 102:6 Lacks foundation, calls for speculation, nonresponsive, asked and						
						answered, probative value substantially outweighed by a danger of wasting						
. / /						time.	77:11	77	11	77	11	
1/31/2022	Kathe Green											7: 21: Relevance (FRE 401); counsel's
							77:15-21	77	15	77		atements are not evidence
1/31/2022	Kathe Green						78:22-24	78	22	78	24	
1/31/2022	Kathe Green						79:4-10	79	4	79		sked and answered
1/31/2022	Kathe Green						79:17-22	79	17	79		9:20-22: Vague and ambiguous
1/31/2022	Kathe Green						80:14-16	80	14	80	16	
1/31/2022	Kathe Green						80:18-81:3	80	18	81	3	
1/31/2022	Kathe Green											oundaction/lacks personal knowledge (FRE
							82:13-23	82	13	82	23 60	02)
1/31/2022	Kathe Green						83:6-11	83	6	83	11	
1/31/2022	Kathe Green						83:21-22	83	21	83		elevance (FRE 401)
1/31/2022	Kathe Green						84:1-4	84	1	84		elevance (FRE 401)
1/31/2022	Kathe Green						87:5-7	87	5	87	7 R	elevance (FRE 401)
1/31/2022	Kathe Green											
					1		00 7 00 65					elevance (FRE 401); undue consumption of
. / /				 			88:7-89:10	88	7	89		me (FRE 403); Hearsay (FRE 801, 802)
1/31/2022	Kathe Green			 			89:15-18	89	15	89	18	
1/31/2022	Kathe Green				1				22			sked and answered; cummulative (FRE
4- 4							89:22	89	22	89	22 40	J3)
1/31/2022	Kathe Green						89:24-90:6	89	24	90	6	
1/31/2022	Kathe Green						90:10	90	10	90	10	
1/31/2022	Kathe Green				1							sked and answered; cummulative (FRE
4- 4							91:6-22	91	6	91	22 40	03)
1/31/2022	Kathe Green						93:13-15	93	13	93	15	
1/31/2022	Kathe Green						93:18	93	18	93	18	
1/31/2022	Kathe Green											oundaction/lacks personal knowledge (FRE
							94:22-25	94	22	94	25 60	02)
1/31/2022	Kathe Green						95:23-96:10	95	23	96	10	
1/31/2022		1		1	II .		00.12.10	0.0	4.0	0.0	4.0	
	Kathe Green						96:12-18	96	12	96	18	
1/31/2022 1/31/2022	Kathe Green Kathe Green						96:12-18 96:21 97:21-23	96 96 97	21 21	96 96 97	21	

Case 1:20-cv-09586-LAK Document 156-2 Filed 03/04/22 Page 31 of 46

1/31/2022	Kathe Green			97-25	97	25	97	25	

Case 1:20-cv-09586-LAK Document 156-2 Filed 03/04/22 Page 32 of 46

	Deposition	Defer	nant Kevin Fowler	's Initial Desig	gnations		Plaintiff Anthony Rapp's Objections	Plaint	tiff Anthony Rap		Defendant Kevin Fowler's Objections to Counter-Designations		
Date	WITNESS	PINCITE	Page Start	Line Start	Page End	Line End	OBJECTION	PINCITE	Page Star	rt Line Start	Page End	Line End	
1/5/2022	Tracie Thoms	5:18-23	5	18	5	23							Relevance (FRE 401); undue consumption of
								9:23-11:7	9	23	11		time (FRE 403)
1/5/2022	Tracie Thoms	6:9-12	6	9	6	12							Relevance (FRE 401); undue consumption of
								12:9-19	12	9	12	19	time (FRE 403)
1/5/2022	Tracie Thoms	6:15-19	6	15	6	19							
								13:14-19	13	14	13	19	
1/5/2022	Tracie Thoms	7:2-12	7	2	7	12							
1 /5 /2022		7.17.01	_	4.7	_	24		14:13-24	14	13	14	24	Hearsay (FRE 801, 802)
1/5/2022	Tracie Thoms	7:17-21	/	17	/	21	7:17-21 Mischaracterizes the testimony,						
							calls for hearsay.	26:20-22	26	20	26	22	
1/5/2022	Tracie Thoms	7:24-8:19	7	24	8	19		26:25-28:15	26	25	28	15	
1/5/2022	Tracie Thoms	9:14-16	9	14	9	16	9:14-16 Relevance, probative value is						
							substantially outweighted by a danger of						
							infair prejudice, confusing the issues,						
						ı	nisleading the jury, wasting time.	28:25-29:9	28	25	29	9	
1/5/2022	Tracie Thoms	9:21	9	21	9	21							
						!	9:21 Lacks personal knowledge.	31:17-23	31	17	31	23	
1/5/2022	Tracie Thoms	13:4-13	13	4	13	13		36:2-14	36	2	36	14	
1/5/2022	Tracie Thoms	13:20-23	13	20	13	23		38:9-16	38	9	38	16	
1/5/2022	Tracie Thoms	14:5-12	14	5	14	12							
1/5/2022	Tracie Thoms	18:17-19:5	18	17	19	5	L8:17-19:5 Relevance, probative value is						
							substantially outweighted by a danger of						
							unfair prejudice, confusing the issues,						
							misleading the jury, wasting time.						
1/5/2022	Tracie Thoms	26:14-19	26	14	26	19	<u> </u>						
1/5/2022	Tracie Thoms	28:16-24	28	16	28	24							
1/5/2022	Tracie Thoms	29:13-30:3	29	13	30	3							
1/5/2022	Tracie Thoms	30:6-10	30	6	30	10							
1/5/2022	Tracie Thoms	30:12-15	30	12	30	15							
1/5/2022	Tracie Thoms	30:21-31:13	30	21	31	13							
1/5/2022	Tracie Thoms	31:24-32:5	31	24	32	5							
1/5/2022	Tracie Thoms	33:4-7	33	4	33	7							
1/5/2022	Tracie Thoms	33:10	33	10	33	10							
1/5/2022	Tracie Thoms	38:17-21	38	17	38	21							
1/5/2022	Tracie Thoms	39:19-40:7	39	19	40	7							
1/5/2022	Tracie Thoms	42:20-25	42	20	42	25							
1/5/2022	Tracie Thoms	43:2-44:7	43	2	44	7							
1/5/2022	Tracie Thoms	47:5-22	47	5	47	22	17.5.22 Balance and 11.						
							17:5-22 Relevance, probative value is substantially outweighted by a danger of			1			
							infair prejudice, confusing the issues,						
							misleading the jury, wasting time, calls for						
							mproper lay opinion, calls for expert			1			
							estimony, lacks foundation, vague, calls for						
							speculation.			1			

Case 1:20-cv-09586-LAK Document 156-2 Filed 03/04/22 Page 33 of 46

1/5/2022	Tracie Thoms	48:7-17	48	7 48	48:7-17 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.			
1/5/2022	Tracie Thoms	48:23-49:16	48	23 49	48:23-49:16 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.			
1/5/2022	Tracie Thoms	49:25	49	25 49	49:25 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.			
1/5/2022	Tracie Thoms	50:5-16	50	5 50	50:5-16 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.			
1/5/2022	Tracie Thoms	50:19-24	50	19 50	50:19-24 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.			
1/5/2022	Tracie Thoms	51:5-10	51	5 51	51:5-10 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.			

Case 1:20-cv-09586-LAK Document 156-2 Filed 03/04/22 Page 34 of 46

1/5/2022	Tracie Thoms	51:14	51	14	51	51:14 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.			
1/5/2022	Tracie Thoms	51:16-20	51	16	51	51:16-20 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.			
1/5/2022	Tracie Thoms	52:2	52	2	52	52:2 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.			
1/5/2022	Tracie Thoms	52:4-5	52	4	52	5 52:4-5 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.			
1/5/2022	Tracie Thoms	52:10	52	10	52	52:10 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.			
1/5/2022	Tracie Thoms	52:12-18	52	12	52	52:12-18 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.			

Case 1:20-cv-09586-LAK Document 156-2 Filed 03/04/22 Page 35 of 46

4 /5 /2022	Totals Theorem	52:23		22	53	22	
1/5/2022	Tracie Thoms		52	23	52		substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.
1/5/2022	Tracie Thoms	52:25-53:3	52	25	53		52:25-53:3 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.
1/5/2022	Tracie Thoms	53:13-54:3	53	13	54		53:13-54:3 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.
1/5/2022	Tracie Thoms	54:7	54	7	54		54:7 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.
1/5/2022	Tracie Thoms	54:9-14	54	9	54		4 54:9-14 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.
1/5/2022	Tracie Thoms	56:5-10	56	5	56	10	
1/5/2022	Tracie Thoms	56:22-57:12	56	22	57		57:6-12 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, argumentative, assumes facts not in evidence.

Case 1:20-cv-09586-LAK Document 156-2 Filed 03/04/22 Page 36 of 46

Case 1:20-cv-09586-LAK Document 156-2 Filed 03/04/22 Page 37 of 46

Deposition		Defen	ant Kevin Fowler's	Initial Desig	nations		Plaintiff Anthony Rapp's Objections	Plaint	iff Anthony R	app's Counter-	Designations		Defendant Kevin Fowler's Objections to Counter-Designations
Date	WITNESS	PINCITE	Page Start	Line Start	Page End	Line End	OBJECTION	PINCITE	Page S	tart Line Sta	rt Page End	Line End	OBJECTION
4/29/2021	Erin Quill	5:17-18	5		5								
4/29/2021	Erin Quill	47:25-50:18	47		50			6:3-9	6	3	6	9	
4/29/2021	Erin Quill	51:14-52:25	51		51		51:14-52:25 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, calls for speculation, lack of personal knowledge, vague.	7:7-8:11	12	7	12	- 11	
4/29/2021	Erin Quill	53:6-20	53		53		53:6-20 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, calls for speculation, lack of personal knowledge, vague.	36:16-42:12	36	16	42	12	Relevance (FRE 401); undue consumption of time (FRE 403); 41:24-45: 12: lack of personal knowledge/speculation (FRE 602); unfairly prejudicial, misleads the jury, confuses the issues (FRE 403); relevance (FRE 401)
4/29/2021	Erin Quill	54:22-25	54		54		53:6-25 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, calls for speculation, lack of personal knowledge, vague.	67:11-13	67	11	67	13	
4/29/2021	Erin Quill	56:3-25	56		56		56:3-25 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for speculation, vague.	68:4-15	68	4	68	15	
4/29/2021	Erin Quill	57:19-58:8	57		57		57:19-58:8 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for speculation, vague, non-responsive.	76:16-17	76	16	76	17	
4/29/2021	Erin Quill	63:20-64:3	63		64		63:20-64:3 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time.	76:20-21	76	20	76	21	

Case 1:20-cv-09586-LAK Document 156-2 Filed 03/04/22 Page 38 of 46

4/29/2021	Erin Quill	65:5-66:24	65	66							
4/29/2021	Eriii Quiii	03.3-00.24	03	00	6.22.24 Polovonos probativo valvo is						
					6:22-24 Relevance, probative value is						
					substantially outweighted by a danger of						
					unfair prejudice, confusing the issues,						
					misleading the jury, wasting time, calls for						
					improper lay opinion, lacks foundation,						
					vague.	78:10-16	78	10	78	16	
4/29/2021	Erin Quill	67:2-10	67	67							
					67:2-10 Relevance, probative value is						
					substantially outweighted by a danger of						
					unfair prejudice, confusing the issues,						
					misleading the jury, wasting time, lacks						
					foundation, vague, calls for speculation,						
					lacks personal knowledge.	105:5-8	105	5	105	8	3
4/29/2021	Erin Quill	67:14-68:3	67	68	67:14-68:3 Relevance, probative value is						
					substantially outweighted by a danger of						
					unfair prejudice, confusing the issues,						
					misleading the jury, wasting time, lacks						
					foundation, vague, calls for speculation,						
					lacks personal knowledge, calls for improper						Relevance (FRE 401); undue consumption of
					lay opinion.	105:12-106:10	105	12	106	10	time, unfairly prejudicial (FRE 403)
4/29/2021	Erin Quill	69:1-70:1	69	70							
					69:1-70:1 Relevance, probative value is						
					substantially outweighted by a danger of						
					unfair prejudice, confusing the issues,						
					misleading the jury, wasting time, calls for						
					improper lay opinion, lacks foundation, lacks						
					personal knowledge, calls for speculation.	107:9-109:1	107	9	109	1	1
4/29/2021	Erin Quill	70:14-22	70	70	personal knowledge, cans for specialization	107.5 105.1	107		203	1	
., 23, 2321	2 Qu	75.2 . 22		, ,	70:14-22 Relevance, probative value is						
					substantially outweighted by a danger of						
					unfair prejudice, confusing the issues,						
					misleading the jury, wasting time, calls for						
					improper lay opinion, lacks foundation, lacks						111: 18-25: nonresponsive; unfairly
					personal knowledge, calls for speculation.	110:16-112:7	110	16	112	_	7 prejudicial (FRE 403)
4/29/2021	Erin Quill	73:7-14	73	73	personal knowledge, cans for speculation.	110.10-112.7	110	10	112	+ '	prejudiciai (FRE 403)
4/29/2021	Etili Quili	73.7-14	/3	/3	72.7.44 Pelevenes and better color to						
					73:7-14 Relevance, probative value is						
					substantially outweighted by a danger of						
					unfair prejudice, confusing the issues,						
					misleading the jury, wasting time, calls for						
					improper lay opinion, lacks foundation, lacks						
					personal knowledge, calls for speculation.	161:14-162:4	161	14	162		1
4/29/2021	Erin Quill	73:16-74:14	73	74							
					73:16-74:14 Relevance, probative value is						
					substantially outweighted by a danger of						
					unfair prejudice, confusing the issues,						
					misleading the jury, wasting time, calls for						
					improper lay opinion, lacks foundation, lacks						
					personal knowledge, calls for speculation.	162:6	162	6	162	(5

Case 1:20-cv-09586-LAK Document 156-2 Filed 03/04/22 Page 39 of 46

4/29/2021	Erin Quill	76:1-15	76	76							
., 25, 2522	2	7 0.12 23			76:1-15 Relevance, probative value is						
					substantially outweighted by a danger of						
					unfair prejudice, confusing the issues,						
					misleading the jury, wasting time, calls for						
					improper lay opinion, lacks foundation, lacks						
					personal knowledge, calls for speculation.	162:8-22	162	Q	162	22	,
4/29/2021	Erin Quill	76:23-77:25	76	77	personal knowledge, cans for speculation.	102.8-22	102	0	102		•
4/23/2021	Lini Quiii	70.23-77.23	70	//	7C-22 77-25 Balancana arabatina nalua ia						
					76:23-77:25 Relevance, probative value is						
					substantially outweighted by a danger of						
					unfair prejudice, confusing the issues,						
					misleading the jury, wasting time, calls for						
					improper lay opinion, lacks foundation, lacks		470		470		
1/20/2021	5 : 0 :	70.47.70.40	70	70	personal knowledge, calls for speculation.	172:4-9	172	4	172	9	1
4/29/2021	Erin Quill	78:17-79:19	78	79							
					78:17-79:19 Relevance, probative value is						
					substantially outweighted by a danger of						
					unfair prejudice, confusing the issues,						
					misleading the jury, wasting time, calls for						
					improper lay opinion, lacks foundation, lacks						
					personal knowledge, calls for speculation.	172:11-173:4	172	11	173	4	Nonresponsive
4/29/2021	Erin Quill	84:1-11	84	84							
					84:1-11 Relevance, probative value is						
					substantially outweighted by a danger of						
					unfair prejudice, confusing the issues,						
					misleading the jury, wasting time, lacks						
					foundation, lacks personal knowledge.	173:16-19	173	16	173	19	
4/29/2021	Erin Quill	85:9-15	85	85							
						174:14-17	174	14	174	17	'
4/29/2021	Erin Quill	86:9-21	86	86							
					86:9-21 Relevance, probative value is						
					substantially outweighted by a danger of						
					unfair prejudice, confusing the issues,						
					misleading the jury, wasting time, lacks						
					foundation, lacks personal knowledge, calls						
					for speculation, non-responsive.	174:20-175:10	174	20	175	10	174:22175: 10 Nonresponsive
4/29/2021	Erin Quill	86:25-87:16	86	87							
					86:25-87:16 Relevance, probative value is						
					substantially outweighted by a danger of						
					unfair prejudice, confusing the issues,						
					misleading the jury, wasting time, lacks						
					foundation, lacks personal knowledge, calls						
					for speculation, non-responsive.	183:5-20	183	5	183	20	Nonresponsive
					Tot speculation, non-responsive.	103.3-20	103	ر ا	103		Notifica portative

Case 1:20-cv-09586-LAK Document 156-2 Filed 03/04/22 Page 40 of 46

Erin Quill	87:22-88:2	87	88							
				107 00 00 0 0 1 1 1 1 1 1 1						
				87:22-88:2 Relevance, probative value is						
				substantially outweighted by a danger of						
				unfair prejudice, confusing the issues,						
				misleading the jury, wasting time, lacks						
				foundation, lacks personal knowledge, calls						
				for speculation, non-responsive.	189:19-22	189	19	189	22	
Erin Quill	88:18-89:18	88	89							
				88:18-89:18 Relevance, probative value is						
				substantially outweighted by a danger of						
				unfair prejudice, confusing the issues,						
				misleading the jury, wasting time, lacks						
				foundation, lacks personal knowledge, calls						
					190:6-14	190	6	190	14	
Erin Quill	91:22-92:12	91	92							
				91:22-92:12 Relevance, probative value is						
				· · · · · · · · · · · · · · · · · · ·	100.21 101.1	100	24	101	1	
Fair Oatil	02:40.04:2	02	0.4	for speculation, non-responsive.	190:21-191:1	190	21	191	1	
Erin Quill	93:18-94:2	93	94							
				The state of the s						
				substantially outweighted by a danger of						
				unfair prejudice, confusing the issues,						
				misleading the jury, wasting time, lacks						
				foundation, lacks personal knowledge, calls						
				for speculation, non-responsive.	191:7-17	191	7	191	17	
Erin Quill	94:7-23	94	94							
				94:7-23 Relevance, probative value is						
				•						
				· · · · · · · · · · · · · · · · · · ·	193-4-6	193	4	193	6	
Erin Quill	101.5 102.14	101	102	Tor speculation, non responsive.	155.4 0	133		133	0	
Lini Quiii	101.3-103.14	101	103	101.F 102.11 Delevere						
				· · · · · · · · · · · · · · · · · · ·						
				· · · · · · · · · · · · · · · · · · ·						
				for speculation, non-responsive.	249:5-7	249	5	249	7	
Erin Quill	104:14-17	104	104							
Erin Quill	104:22-105:4	104	105							
Erin Quill	106:11-107:8	106	107							
Erin Quill	109:2-110:15	109	110							
Erin Quill	127:18-129:11	127	129							
Erin Quill	160:25-161:13	160	161							
	irin Quill	irin Quill 91:22-92:12 irin Quill 93:18-94:2 irin Quill 94:7-23 irin Quill 101:5-103:14 irin Quill 104:14-17 irin Quill 104:22-105:4 irin Quill 106:11-107:8 irin Quill 109:2-110:15 irin Quill 127:18-129:11	irin Quill 91:22-92:12 91 irin Quill 93:18-94:2 93 irin Quill 94:7-23 94 irin Quill 101:5-103:14 101 irin Quill 104:14-17 104 irin Quill 104:22-105:4 104 irin Quill 106:11-107:8 106 irin Quill 109:2-110:15 109 irin Quill 127:18-129:11 127	irin Quill 91:22-92:12 91 92 irin Quill 93:18-94:2 93 94 irin Quill 94:7-23 94 94 irin Quill 101:5-103:14 101 103 irin Quill 104:14-17 104 104 irin Quill 104:22-105:4 104 105 irin Quill 106:11-107:8 106 107 irin Quill 109:2-110:15 109 110 irin Quill 127:18-129:11 127 129	Sex.18-89-18 88 88 89 88 88.18-89-18 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading their, was sting time, lacks foundation, lacks personal knowledge, calls for speculation, non-responsive. 91:22-92:12 91 92 91:22-92:12 91 92 91:22-92:12 91 92 91:22-92:12 891 92 91:22-92:12 891 994 93:18-94:2 93 94 94 94:7-23 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, lacks personal knowledge, calls for speculation, non-responsive. 93:18-94-2 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, lacks personal knowledge, calls for speculation, non-responsive. 94:7-23 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, lacks personal knowledge, calls for speculation, non-responsive. 101 103 101:5-103:14 101 103 101:5-103:14 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, lacks personal knowledge, calls for speculation, non-responsive. 102 101:5-103:14 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, lacks personal knowledge, calls for speculation, non-responsive. 103 101:5-103:14 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, lacks personal knowledge, calls for speculation, non-responsive.	S8:18-89:18 S8 S8:18-89:18 S8 S8:18-89:18 S8:18-92:12 S9:12-29:12 S9:12-29:12 S9:12-29:12 S9:12-29:12 S9:12-29:12 S9:12-29:12 S9:12-29:12 S9:12-29:12 S9:18-94:2 S9:18-94:2	S8:18-89:18 S8 S8:18-89:18 S8 S8:18-89:18 S9:18-92:12 S9:12-92:12 S9:12-92:12 S9:12-92:12 S9:12-92:12 S9:12-92:12 S9:12-92:12 S9:12-92:12 S9:12-92:12 S9:12-92:12 S9:13-94-2 S9:18-94-2 S9:18-94	S8:18-89:18 S8 S8:18-89:18 S8 S8:18-89:18 S8:18 S8:18 S8:18 S8:18-89:18 S8:18 S8:18	Section Quill Section Section	Strin Quill Strin Quill

Case 1:20-cv-09586-LAK Document 156-2 Filed 03/04/22 Page 41 of 46

4/29/2021	Erin Quill	162:24-163:6	162	163				
4/29/2021	Erin Quill	165:23-167:3	165	167				
4/29/2021	Erin Quill	167:19-168:6	167	168				
4/29/2021	Erin Quill	168:21-169:17	168	169				
4/29/2021	Erin Quill	169:20-170:8	169	170				
4/29/2021	Erin Quill	171:5-172:3	171	172				
4/29/2021	Erin Quill	173:6-11	173	173				
4/29/2021	Erin Quill	173:22-174:5	173	174				
4/29/2021	Erin Quill	174:7-8	174	174				
4/29/2021	Erin Quill	176:3-6	176	176				
4/29/2021	Erin Quill	176:10-18	176	176				
4/29/2021	Erin Quill	182:22-183:4	182	183				
4/29/2021	Erin Quill	183:21-24	183	183				
4/29/2021	Erin Quill	184:1-8	184	184				
4/29/2021	Erin Quill	189:2-18	189	189				
4/29/2021	Erin Quill	189:23-190:5	189	189				
4/29/2021	Erin Quill	190:15-20	190	190				
4/29/2021	Erin Quill	191:2-6	191	191				
4/29/2021	Erin Quill	191:18-193:3	191	193				
4/29/2021	Erin Quill	193:7-17	193	193				
4/29/2021	Erin Quill	212:12-213:17	212	213	212:12-213:17 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, lacks personal knowledge, calls for speculation, non-responsive, vague.			
4/29/2021	Erin Quill	213:19-215:13	213	215	213:19-215:13 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, lacks personal knowledge, calls for speculation, non-responsive.			
4/29/2021	Erin Quill	215:15-16	215	215	215:15-16Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, lacks personal knowledge, calls for speculation, non-responsive.			

Case 1:20-cv-09586-LAK Document 156-2 Filed 03/04/22 Page 42 of 46

4/29/2021	Erin Quill	215:18-21	215	215			
					215:18-21 Relevance, probative value is		
					substantially outweighted by a danger of		
					unfair prejudice, confusing the issues,		
					misleading the jury, wasting time, lacks		
					foundation, lacks personal knowledge, calls		
					for speculation, non-responsive.		
4/29/2021	Erin Quill	215:25-216:20	215	16			
					215:25-216:20 Relevance, probative value is		
					substantially outweighted by a danger of		
					unfair prejudice, confusing the issues,		
					misleading the jury, wasting time, lacks		
					foundation, lacks personal knowledge, calls		
					for speculation, non-responsive.		
4/29/2021	Erin Quill	249:1-4	249	249			
4/29/2021	Erin Quill	250:23-24	250	250			
					250:23-24 Relevance, probative value is		
					substantially outweighted by a danger of		
					unfair prejudice, confusing the issues,		
					misleading the jury, wasting time.		
4/29/2021	Erin Quill	251:1	251	251			
					251:1 Relevance, probative value is		
					substantially outweighted by a danger of		
					unfair prejudice, confusing the issues,		
					misleading the jury, wasting time.		

Case 1:20-cv-09586-LAK Document 156-2 Filed 03/04/22 Page 43 of 46

Deposition		Defena	ant Kevin Fowler'	's Initial Desig	gnations	Plaintiff Anthony Rapp's Objections	Plaint	iff Anthony Rapp	's Counter-D	esignations		Defendant Kevin Fowler's Objections to Counter-Designations
Date	WITNESS	PINCITE	Page Start	Line Start	Page End	Line End OBJECTION	PINCITE	Page Start	Line Start	Page End	Line End	OBJECTION
6/23/2021	Adam Rapp		7	4	7	5						
												Beyond the scope of direct
C /22 /2024		7:4-5					12:13-13-7	12	13	13	7	testimony/improper counter designation
6/23/2021	Adam Rapp											Beyond the scope of direct
		70:15-71:5	70	15	71	5	13:19-14:7	13	19	14	7	testimony/improper counter designation
6/23/2021	Adam Rapp											, рарания
												Beyond the scope of direct
		71:16-72:24	71	16	72	24	14:14-17:9	14	14	17	9	testimony/improper counter designation
6/23/2021	Adam Rapp											
												Improper counter-designation:
		74.2.75.42	7.4	2	75	74:2-75:12 Hearsay, relevance, probative value substantially outweighed by a danger of unfair	17.17.04	47	4.7	4.7	2.4	nonresponsive and irrelevant to Mr.
6/23/2021	Adam Rapp	74:2-75:12	74 76		75 78	12 prejudice, confusing the issues, misleading the jury, FRE 412(a).	17:17-24	17	17	17	24	Fowler's designated portion;
0/23/2021	Auaiii Kapp		70	13	76	15						Improper counter-designation:
						76:15-78:19 Relevance, probative value substantially outweighed by a danger of unfair prejudice,						nonresponsive and irrelevant to Mr.
		76:15-78:19				confusing the issues, misleading the jury, FRE 412(a).	19:25-22:19	19	25	22	19	Fowler's designated portion
6/23/2021	Adam Rapp	70.23 70.23	79	24	87	16	15125 22125	13				Improper counter-designation:
												nonresponsive and irrelevant to Mr.
						79:24-87:16 Relevance, probative value substantially outweighed by a danger of unfair prejudice,						Fowler's designation; cummulative, undue
		79:24-87:16				confusing the issues, misleading the jury, wasting time, FRE 412(a).	26:17-27:17	26	17	27	17	consumption of time
6/23/2021	Adam Rapp		88	12	88	19						Improper counter-designation:
												nonresponsive and irrelevant to Mr.
						88:12-19 Relevance, probative value substantially outweighed by a danger of confusing the issues,						Fowler's designation; cummulative, undue
		88:12-19				wasting time.	34:5-35:4	34	5	35	4	consumption of time
6/23/2021	Adam Rapp											Improper counter-designation:
						107:15-107:17 Relevance, probative value substantially outweighed by a danger of unfair prejudic	e,					nonrespnosive and irrelevant to Mr.
		107.45.47	407	45	407	confusing the issues, misleading the jury, wasting time and fairness requires the full account be	25 42 27 2	25	4.2	27		Fowler's designation; cummulative,
6/23/2021	Adam Rapp	107:15-17	107	15	107	17 read as set forth in Plaintiff's designations pages 12 through 60.	35:12-37:2	35	12	37		misleads the jury (FRE 403)
0/23/2021	Auaiii Kapp					107:19-108:14 Relevance, probative value substantially outweighed by a danger of unfair prejudic						Improper counter-designation: nonresponsive and irrelevant to Mr.
						confusing the issues, misleading the jury, wasting time and fairness requires the full account be	Ε,					Fowler's designation; cummulative, undue
		107:19-108:14	107	19	108	14 read as set forth in Plaintiff's designations pages 12 through 60.	46:18-47:18	46	18	47	18	consumption of time
6/23/2021	Adam Rapp		-									
		126:24-127:23	126	24	127	126:24-127:23 Hearsay, relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, FRE 412(a).	52:5-55:6	52	_	55	6	
6/23/2021	Adam Rapp	120.24-127.23	120	24	127	25 prejudice, confusing the issues, misleading the jury, FRE 412(a).	32.3-33.0	32	J	33	0	
0/23/2021	ишт карр											Improper counter-designation:
												nonresponsive and irrelevant to Mr.
						132:20-133:2 Objection to everything after "No," as non-responsive; 133:14-134:4 Relevance,						Fowler's designation; cummulative, undue
						probative value substantially outweighed by a danger of confusing the issues, misleading the jury,						consumption of time (FRE (403); hearsay
		128:7-134:14	128		134	14 wasting time, calls for speculation, non-responsive.	62:7-63:14	62	7	63	14	(FRE 801, 802)
6/23/2021	Adam Rapp		134	17	136	10						
												Improper counter-designation:
												nonresponsive and irrelevant to Mr. Fowler's designation; cummulative, undue
						134:24-135:19 Lacks foundation, calls for speculation, non-responsive; 136:6-10 Lacks foundation,						consumption of time (FRE (403); hearsay
		134:17-136:10				calls for speculation.	64:11-65:22	64	11	65	22	(FRE 801, 802)
6/23/2021	Adam Rapp		136	22	137	23						
												Improper counter-desigantion:
												nonresponsive and irrelevant to Mr.
												Fowler's designation; cummulative, undue
		426 22 427 22				4377 33 01 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	55 40 24	66	40			consumption of time; hearsay (FRE 801,
		136:22-137:23				137:7-23 Objection to everything after "I don't know," calls for speculation, lacks foundation.	66:19-24	66	19	66	24	802)

Case 1:20-cv-09586-LAK Document 156-2 Filed 03/04/22 Page 44 of 46

6/23/2021	Adam Rapp		138	24	139)	8					I
0, ==, ====												Improper counter-desigantion: nonresponsive and irrelevant to Mr.
												Fowler's designation; cummulative, undue
												consumption of time; hearsay (FRE 801,
s (aa (aas)		138:24-139:18						68:7-69:14	68	7	69	14 802)
6/23/2021	Adam Rapp											
		172:3-11	172	,	172		1	72:25-73:25	72	25	73	Relevance (FRE 401); unfairly prejudicial, 25 confuses the issues (FRE 403)
6/23/2021	Adam Rapp	1/2:3-11	1/2	3	1/2	2	1	72:25-73:25	/2	25	/3	25 confuses the issues (FRE 403)
0,23,2021	, кааттарр											
		172:15-18	172	15	172	,	8	75:13-76:11	75	13	76	11
6/23/2021	Adam Rapp									~		
		173:22-174:18	173	22	174	ı	8	108:15-23	108	15	108	23
6/23/2021	Adam Rapp											
		175:24-177:12	175	24	177	7	2	127:24-128:6	127	24	128	6
6/23/2021	Adam Rapp											
								136:11-16	136	11	136	Improper designation: nonresponsive to
6/23/2021	Adam Rapp							136:11-16	136	11	136	16 Mr. Fowler's designation
0/23/2021	Ацані Карр											
								137:24-138:23	137	24	138	23
6/23/2021	Adam Rapp		190	15	191	L	6					
							190:18-191:2 Objection to everything after"No," as non-responsive, lacks foundation, calls for					
		190:15-191:6					speculation, relies on hearsay.	139:19-140:4	139	19	140	4
6/23/2021	Adam Rapp											Improper designation: nonresponsive to
												Mr. Fowler's designation; cummulative,
												unfairly prejudicial (FRE 403); hearsay (FRE
								140:10-141:17	140	10	141	17 801, 802)
6/23/2021	Adam Rapp		200	17	201	1	5					Improper designation: nonresponsive to
												Mr. Fowler's designation; cummulative,
												unfairly prejudicial (FRE 403); hearsay (FRE
6/23/2021	Adam Rapp	200:17-201:5	208		209	1	200:17-201:5 Relevance, lacks foundation, cumulative.	141:25-142:17	141	25	142	17 1701, 1702)
0/23/2021	Ацані Карр		208	,	203	'l	3					
												Improper designation: nonresponsive and
												irrelevant to Mr. Fowler's designation;
		208:9-209:3					208:9-209:3 Relevance, probative value substantially outweighed by a danger of confusing the issues, wasting time, cumulative.	142:25-143:11	142	25	143	cummulative and undue waste of time (FRE 11 403); Hearsay (FRE 801, 802)
6/23/2021	Adam Rapp	208.5-205.5	209	21	. 210)	2	142.23-143.11	142	23	143	11 403), Healsay (FRE 801, 802)
, , ,												
												Improper designation: nonresponsive and
												irrelevant to Mr. Fowler's designation; cummulative and undue waste of time (FRE
		209:21-210:2					209:21-210:2 Asked and answered.	143:24-144:12	143	24	144	12 403); Hearsay (FRE 801, 802)
6/23/2021	Adam Rapp		210	5	218	3	1 210:5-8 No foundation, calls for speculation, vague as to time; 210:9-19 Asked and answered,					, , , , , , , ,
							relevance, misleading, vague as to time; 212:3-213:7 Lacks foundation, calls for speculation, lac					
							personal knowledge, hearsay; 213:25-214:16 Lacks foundation, calls for speculation, lacks personal knowledge hearsay; 213:25-214:16 Lacks foundation, calls for speculation, lacks personal knowledge hearsay; 213:25-214:16					Improper desigantion: nonresponsive and irrelevant to Mr. Fowler's designation;
							knowledge, hearsay; 214:17-215:5 Lacks foundation, hearsay, calls for speculation, lacks person knowledge; 215:6-215:14 Lacks foundation, calls for expert testimony, improper lay opinion; 21					cummulative, and unfairly prejudicial (FRE
		210:5-218:21					216:16 Lacks foundation, calls for speculation, calls for hearsay, lacks personal knowledge, vagu		172	19	173	21 403); hearsay (FRE 801, 802)
6/23/2021	Adam Rapp		219	18	219)	4					
												Improper desigantion: nonresponsive and
							219:18-22, 219:23-24 Lacks foundation, calls for speculation, improper lay opinion, improper					irrelevant to Mr. Fowler's designation; cummulative, and unfairly prejudicial (FRE
							expert opinion, vague, relevance, probative value is substantially outweighted by a danger of un	ıfair				403); hearsay (FRE 801, 802); incomplete

Case 1:20-cv-09586-LAK Document 156-2 Filed 03/04/22 Page 45 of 46

6/23/2021	Adam Rapp		220	4 220	10 220:4-5, 220:9-10 Relevance, probative value is substantially outweighted by a danger of unfair			1		
0, 23, 2021	raam napp	220:4-10			prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, calls for	187:7-11	187	7	187	Improper designation: nonresponsive and 11 irrelevant to Mr. Fowler's designation
6/23/2021	Adam Rapp	220:4-10	220	18 221	speculation, improper lay opinion, improper expert opinion, vague as to time.	187:7-11	187	/	187	11 Irrelevant to Mr. Fowler's designation
0/23/2021	Ацані Карр	220:18-221:2	220	16 221	prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, calls for speculation, improper lay opinion, improper expert opinion, vague.	187:24-188:2	187	24	188	Improper designation: nonresponsive and 2 irrelvant to Mr. Fowler's designation
6/23/2021	Adam Rapp		221	7 221	9					
		221:7-9			221:7-9 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, calls for speculation, improper lay opinion, improper expert opinion, vague.	188:6-8	188	6	188	Improper designation: nonresponsive and irrelevant to Mr. Fowler's designation; relevance (FRE 401); undue waste of time and unfairly prejudicial (FRE 403); witness's refusal to answer question is not evidence
6/23/2021	Adam Rapp		221	14 221	20					
		221:14-20			221:14-15, 221:19-20 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, improper lay opinion, improper expert opinion, vague; 221:16-18 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time.	191:19-192:10	191	19	192	Improper designation: nonresponsive and irrelevant to Mr. Fowler's designation; relevance (FRE 401); undue waste of time and unfairly prejudicial (FRE 403); vague and ambiguous; foundation/calls for speculation (FRE 602); impermissible 10 opinion testimony (FRE 701, 702)
6/23/2021	Adam Rapp		221	24 222	7 221:24 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, improper lay opinion, improper expert opinion, vague; 221:25-222.7 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting					
		221:24-222:7			time, improper lay opinion, improper expert opinion.	202:20-203:2	202	20	203	2
6/23/2021	Adam Rapp		222	19 222	23					
		222:19-23			222:19-21 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time; 222:22-23 Vague, lacks foundation, relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, improper lay opinion, improper expert opinion.	203:19-204:4	203	19	204	Improper designation: nonresponsive and irrelevant to Mr. Fowler's designation; relevance (FRE 401); undue consumption of 4 time (FRE 403)
6/23/2021	Adam Rapp		222	25 223	4					
C (22 /2224		222:25-223:4	223	44 222	222:25 Vague, lacks foundation, relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, improper lay opinion, improper expert opinion; 223:2-4 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time.	204:14-205:14	204	14	205	Improper designation: nonresponsive and 14 irrelevant to Mr. Fowler's designation
6/23/2021	Adam Rapp	223:11-14		11 223	223:11-14 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, improper lay opinion, improper expert opinion.	218:22-219:17	218	22	219	Improper designation: nonresponsive and irrelevant to Mr. Fowler's designation; relevance (FRE 401); undue consumption of time (FRE 403); lack of personal 17 knowledge/speculation (FRE 611)
6/23/2021	Adam Rapp		226	18 228	5					
		226:18-228:5			226:18-21 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks personal knowledge; 226:22-25 Compund, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, improper lay opinion, improper expert opinion; 227:2-11 Objection to everything after "No," as non-responsive, lacks foundation, improper lay opinion, improper expert opinion. 227:12-25 Lacks foundation, calls for speculation, vague, calls for lay and expert testimony, improper lay opinion, relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time; 228:2-5 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time.	226:7-17	226	7	226	17
6/23/2021	Adam Rapp		229	7 229	9					
		229:7-9			229:7-9 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time.	229:19-230-6	229	19	230	6

Case 1:20-cv-09586-LAK Document 156-2 Filed 03/04/22 Page 46 of 46

6/23/2021	Adam Rapp		229	16	229	1	18						
		229:16-18					confus	6-18 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, using the issues, misleading the jury, wasting time.	230:12-15	230	12	230	15
6/23/2021	Adam Rapp		230	16	230	1	19						
		230:16-19						16-19 Relevance, probative value is substantially outweighted by a danger of unfair prejudice, using the issues, misleading the jury, wasting time, lack of personal knowledge.	249:5-252:10	249	5	252	Improper designation: nonresponsive and 10 irrelevant to Mr. Fowler's designation
6/23/2021	Adam Rapp		232	15	235		2						
		232:15-235:2					prejud	15-235:2 Relevance, probative value is substantially outweighted by a danger of unfair dice, confusing the issues, misleading the jury, wasting time, lacks foundation, calls for away, non-responsive.	253:3-256:22	253	3	256	255:11256:22: foundation/lack of 22 personal knowledge/speculation (FRE 602)
6/23/2021	Adam Rapp		235	20	236	1	17	ap a square					, , , , , , , , , , , , , , , , , , , ,
		235:20-236:17					prejud	20-236:17 Relevance, probative value is substantially outweighted by a danger of unfair dice, confusing the issues, misleading the jury, wasting time, lacks foundation, calls for say, non-responsive.	257:18-24	257	18	257	24
6/23/2021	Adam Rapp	262:17-23	262	17	262	2	23	ay, non-responsive.	258:2-259:5	258	2	259	24
6/23/2021	Adam Rapp	202.17-23									2		3
6/23/2021	Adam Rapp								259:8-15	259	8	259	15 Vague and ambiguous
									259:18	259	18	259	Relevance (FRE 401); unfairly prejudicial, misleads the jury, confuses the issues (FRE 18 403)
6/23/2021	Adam Rapp												Relevance (FRE 401); unfairly prejudicial, misleads the jury, confuses the issues (FRE
6/23/2021	Adam Rapp								260:14-22	260	14	260	22 403)
-, -,									260:24-261:12	260	24	261	12